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April 8, 2022

City Council
City of Pasadena
175 North Garfield
Pasadena CA 91109

Subject: Agenda Item #9 for April 11, 2022, Sustainable Communities Environmental Assessment (SCEA) for 86 S. Fair Oaks Ave; Request for Completion of EIR

Honorable Mayor and Councilmembers:

On behalf of the Castle Green Homeowners Association, we object to approval of the Sustainable Communities Environmental Assessment (SCEA) for analysis of environmental impacts of the Central Park Apartments project.

We recognize that the Council is being urged by its staff and the City Attorney's office to proceed with the SCEA. But you have a choice. An environmental impact report (EIR) process rather than a SCEA process is the best, and likely *the only*, way to ensure that the Project will proceed with full analysis and input of the Design Commission, in turn informing this Council's decisions. The Staff Report at page 2 incorrectly states the Design Commission approved the SCEA document and findings in a February meeting. In reality, the Design Commission made an advisory recommendation, after receiving false staff assurances of a future ability to address various aspects of the project, that the SCEA process was an acceptable review process. This recommendation was not based on full and correct information, so an EIR should be prepared instead, as explained below.

A. The City and its Design Commission Would Be Needlessly Constrained by Reliance on a SCEA Rather than Completion of an EIR Review Process.

The City has two alternative means of conducting environmental review of the proposed Project: an EIR or a SCEA. However, only one- the EIR process- preserves the full range of discretion and ability of the City- through its Design Commission and ultimately through this Council- to adequately analyze and mitigate the full range of impacts of the proposed project. The inadequacy of an SCEA to properly and fully review the Proposed Project is demonstrated by the concerns raised by the Design Commission's comments during a prior advisory review of project proposed on the same

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site, and by the Commission's comments at its most recent advisory review of the current SCEA on February 22, 2022.

At the Commission's most recent review of the proposed SCEA on February 22, 2022, the Commission asked various questions about issues that could fall outside the scope of the SCEA. The Commission was informed by staff that they would be able to consider issues, but that consideration will be constrained and limited by what the Commission can actually do or require during a review based on a SCEA. We are attaching a transcript prepared for the Commission hearing of February 22, 2022. (Enclosure 1.) The following provides pertinent highlights of the Design Commission discussion:

- Planner Kevin Johnson states "the SCEA also requires that the project incorporate all feasible mitigation measures, performance standards or criteria from prior applicable EIR's". (p. 6, lines 10-12.) That of course is opposed to the view that the SCEA is a "new" project, and weighs in favor of continuing the prior EIR review process abandoned in 2015.
- Kevin Johnson goes on to say that "the current SCEA analysis is not based on any data or studies from any previous iteration of a project on this site" (lines 23-26) and "all of the analysis that's prepared in the SCEA is based upon this new project scope."
- In commenting to the Commission about its ability to condition the Project if an SCEA is used, Mr. Johnson says "conditions of approval are recommended, which would be tied to the Design Review decision... to manage trips and protect the neighborhood." (page 7, lines 4-5.) The SCEA process, unlike an EIR process, would not allow the Commission to address trips to protect the neighborhood.
- In an exchange between Mr. Johnson and a Commissioner, Mr. Johnson says that the process will include only concept design, not preliminary design. (lines 27-28 on page 7 and lines 1-12 on page 8.) Mr. Johnson says the already completed preliminary design review was completed for this project (in 2017). That process was not a part of the SCEA process and so whatever came from that would have been done with the Commission believing it would go through an EIR process including alternatives etc. Commissioners who were concerned with this process were made comfortable in later parts of the meeting that they would have more rights of approval than they will in fact have.
- Mr. Johnson then makes another confusing statement on page 8, lines 21-28 implying that the design commission is the entity authorized to take action on environmental documentation and routinely does in design review cases where there aren't zoning entitlements required for the project, like this one. He implies staff did the Commission's job for them by doing a SCEA, so it could really be a negative declaration. Mr. Johnson then says "the design commission is the review authority for the project"

- There is another issue, traffic which is totally misrepresented in many ways as it relates to what the Commission will be able to consider etc. At the end of page 9 through the first part of page 10, a Pasadena DOT person implies that whatever the City Council approved as updated CEQA thresholds in November 2020 would be used. The statement is confusing in that the DOT person seems to say that this project would need to comply with that, then after another question says the project does not apply to the updates outside CEQA methodology. More importantly, later in the meeting there are several more references to the Commission having options to consider alternatives for traffic etc. which are not corrected by the staff attorney or Mr. Johnson. Later on page 11, lines 18-21, Mr. Johnson says there are some conditions of approval recommended by the DOT that will "be coming to the commission during design review", but that document was not included in what has been made available.
- Commissioner Timothy Sales was concerned about providing an up or down vote on the applicability of SCEA to the project and questioned what the Commission will really be able to do in the future. (Transcript, pages 12-13). The key part of the conversation is when Mr. Johnson says "if you believe based on your analysis or review of the document...there are inadequacies in the environmental documentation that you think need to be addressed, or that the City Council should consider that would be important for you to provide." Mr. Johnson then goes on to say in lines 19-27, "with respect to environmental impacts, that would be something for the commission to evaluate here" and "if you feel there's more analysis needed there or something that would be an appropriate comment to provide." This is important because *Mr. Johnson is saying the purpose of the advisory meeting is not, in fact, advisory on SCEA, but more of an approval of the documentation included in the SCEA and the Commission is a responsible party reviewing all SCEA documents and providing comments.* Commissioner Timothy Sales says "So what do you envision the process for us to engage in understanding technical matters related to the documents presented? And is that [] something we would get into now or is it something we'll get into after something else happens?" Mr Johnson then suggests moving to public comment and determining who would be best to answer his questions (Transcript, page 14, lines 16-23).
- On page 15, lines 1-13, Commissioner Chiao asks about alternatives in the design review process, Mr. Johnson provides a confusing answer when he says, the "code" [without specifying which code], does not allow the commission to reduce the project's allowable density or residential units below what the zoning code allows "you could recommend further studies of massing alternatives... or other methods to reduce the scale of the project."
- On page 15 lines 27-28 through page 16 lines 1-4, Mr. Johnson tells Commissioner Rao during design review views of the historic buildings can be addressed.

- On page 24, there is a brief conversation where Commissioner Carpenter asks a representative of the applicant the difference in review process, particularly related to traffic between a SCEA and the EIR. Mr. Johnson says there is no difference. Then Theresa Fuentes says the EIR process was not used because "the prior EIR was done under the prior legal framework, which has shifted and why the EIR is no longer relevant." This is not true at all. The City has the right to use an EIR if the Council wants to and it is no less a process than the SCEA from a legal perspective.
- On page 28, Mr. Johnson implies that the Commissioner could ask for shading studies as it relates to massing and views and other things.
- On page 30, lines 10-15, environmental staff representative Bellas makes the point that all prior EIR's mitigation measures need to be implemented. No one corrected him.
- On page 31 lines 22-23, Commissioner Sales says "the environmental analysis is satisfactory from a point of view of checking the boxes" and then goes on to say that the SCEA does not permit additional analysis he thinks needs to be completed related to transportation issues. Then he goes on to say that it would be reasonable for the design review commission to recommend further conditions of approval informed by community feedback and "preserving our rights in this dialogue...to return to these issues later in design because as we've already seen, it was October 2017 when the preliminary consultation was done...and it doesn't serve the city to have these things dragged out so long and have a lack of institutional knowledge". (P. 32, line 10.)
- Finally on page 35, Commissioner Sales makes the point that the Commission will have the opportunity "to come back through with regards to conditions of approval" and "make sure we get the project we deserve ". The optimal way this can occur is if an EIR, rather than a SCEA, is chosen by the City Council as the environmental review process for the proposed project.

(Transcript of February 22, 2022 Design Commission Hearing, [Enclosure 1].)

Previously, in 2015, the Design Commission reviewed a project presentation originally called the "Green Hotel Apartments" during the Draft Environmental Impact Report process that culminated in a June 2015 Final EIR (State Clearinghouse Number 2013031067.) At that time the Commission expressed many concerns that required — and continue to warrant — additional environmental analysis and resolution.

As was summarized in the Final EIR (which was not certified as accurate or complete) in SCEA Appendix I (3-126-130, 3-158), the Commission's comments that still await adequate analysis include:

Commissioner Barar: If you put this new building in its historic context, is the impact on the historic resource considered negligible? The building puts another shade on how view of the historic resources is taken. I suggest that all facades of Green Hotel be considered primary views.

Commissioner Byram: The new building will obscure and block views from Central Park. Need to study alternatives with varied footprint.

Commissioner Hansen: The visual simulations in the EIR show substantial changes in appearance. How did the EIR analysis conclude that there were no significant visual impacts? How closely do we need to study the compatibility of building appearances, relative to historic resources? The original (1903) development plan for the project site should be evaluated as a project alternative.

Commissioner Maitless: Was off-site parking considered for the project?

Commissioner Miller: Why was the segment of Fair Oaks Avenue between Dayton and Del Mar not studied? There is potential for real transportation impacts, especially the way the proposed project is designed. There may be potential for queuing. My suggestion is to have Dayton Street be a westbound one-way street.

Commissioner Moreno: The whole block is historic. Is there a requirement of building material for this certain building development? Is there an impact on historic resources relative to building materials? How does Draft EIR address issues on external materials or construction building type?

Commissioner Rawlings: I would like to see a review of the scenic views (*i.e.*, of the park) and evaluation of more alternatives. The spatial compatibility of size and mass, in general, suggests having more alternatives. Are there measures that could reduce the traffic impacts on Dayton Street, even if they don't completely eliminate the significant impact? Relative to the infeasibility of the alternatives, was a "pro forma" done on all the alternatives?

In this particular project, the SCEA process is problematic because it specifically excludes design review. The Design Commission reviewed a version of this project in 2017, two years before there were any reported court decisions about the use of an SCEA review process. Additionally, only two of the nine current design commissioners had any input into the design of the current proposed project as is obvious from the discussions in the advisory meeting of the Design Commission a few weeks ago. The City of Pasadena should not be held hostage by a process; it should ensure for its residents that the best possible project is developed at one of the most iconic historical sites in the city. The only way that is possible is to have a fully vetted design review process that allows the

Design Commission to do its job and have its typical rights and obligations to review every part of the project, not just a few aspects as limited by the SCEA process.

The SCEA process may perhaps lend itself to some development approvals. However, in this case, Design Review has been specifically excluded from many of the aspects of creating the best possible outcome for the City and its residents. There is no reason for expediting this project without that meaningful and informed review by the Design Commission. We would ask that the City Council have Design Review be given the unhobbled ability to determine the most appropriate project in all aspects through an EIR, without the limitations of SCEA.

B. The City Should Require Preparation of an Adequate EIR.

City staff has encouraged the SCEA process, but following a SCEA process rather than completing the previously initiated EIR process is neither a required nor an appropriate course. Public Resources Code section 21155.2 subdivision (c) that addresses SCEA procedures specifically provides that a “transit priority project ... may be reviewed by an [EIR]” that complies with various requirements. That is more than appropriate here. We ask that you exercise your authority to direct the completion of the EIR process so that the important environmental concerns of the public and the Design Review Commissioners can be fully addressed.

C. The Project as Presented Would Have Unacceptable Impacts.

The applicant, Architectural Resources Group Inc. (ARG), proposes a 32,362-square foot project. An inappropriate or incompatible project could have the effect of detracting not just on views to and from the National Register-designated Hotel Green Apartments and Castle Green, but could change the low-rise scale of the entire historic district. Any consideration of a project in this area must be undertaken with utmost sensitivity to the broad context of this historic property. Consideration should also encompass impacts on local traffic patterns that significantly affect the ambience of the district. Consideration of cumulative impacts, air quality and land use impacts, areas of controversy, and alternatives would be lost by relying upon the SCEA review process.

1. To Better Inform and Serve the Public, the City Should Rely On An EIR.

An EIR has already been prepared and circulated for a project proposed by Goldrich Kest in 2014 called the Green Hotel Apartments. It is within the Council’s discretion to direct that the EIR process continue — with appropriate updating and responses to comments. Otherwise, shifting to a SCEA document constrains City review by negating and omitting analyses of environmental impacts and alternatives. The proposed project would impact historic resources, traffic, and aesthetics and demands

more careful consideration than is possible with the SCEA to avoid profound effects on the character of the entire City.

2. Historic Impacts could be Significant, requiring an EIR.

The project is proposed *on* a historically designated site. As has been pointed out to the City in correspondence from Kelly Sutherlin MacLeod, AIA, and Francesca Smith, an architectural historian, the boundaries of the historic Castle Green and Green Hotel are defined in the original National Register registration form. Those boundaries include the entire square block bounded by Raymond Avenue on the east, Green Street on the north, Fair Oaks Avenue on the west and Dayton Street on the south. The project as proposed could have the effect of detracting from views to and from the National Register designated Hotel Green Apartments and Castle Green and could change the ambience of the historic district that surrounds it. Any consideration of the project as proposed in this area must be undertaken with the utmost sensitivity to the context of the area and this historic property.

3. A Reasonable Range of Alternatives to the Proposed Project must be Included in an EIR.

Relying on a SCEA would deprive the City of an ability to examine alternative configurations and designs of the proposed project. In the previous EIR for the Green Hotel Apartments Project, only one alternative was deemed possible (EIR p. 1-5 [addressing Reduced Height Alternative]) — an inadequacy compounded by the SCEA.

CEQA's core statutory purpose is to *avoid* adverse impacts. There are many alternate uses for the project site that would not adversely affect historic resources. An EIR must analyze alternate locations that could accommodate the type of project the proponents plan without causing the same significant impacts.

In addition to off-site locations, alternate onsite designs that reduce significant impacts must also be considered, including two reduced-density alternatives. One such alternative could be the original third wing extension from Colonel Green's never built "1903 Concept." Sadly, the SCEA unjustly refers to this project as based on this concept, calling it "The 1903 Vision." Yet the proposed project is in complete contradiction to Colonel Green's intent and illustrations, and to Goldrich & Kest's own admitted attempt to illustrate the 1903 Concept in 2011 (Scheme C of three presented options.) (See 2015 FEIR, Attachment G, PDF page 38.)

If the City were to rely on the SCEA, CEQA's core requirement to analyze feasible, less environmentally damaging alternatives would be evaded.

As the SCEA at Appendix A, page 1, states: “Public Resources Code Section [21155.2] requires that a transit priority project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs.”

The SCEA asserts “The City has complied with PRC Section 21151.2 [sic] by reviewing all of the suggested mitigation measures in Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy) and the City of Pasadena General Plan EIR for imposition on the project.” *This is incorrect.* The SCEA has not incorporated mitigation measures from the Draft EIR prepared for the Castle Green Apartments proposal. Alternatives are a form of mitigation measure: “The chief goal of CEQA is mitigation or avoidance of environmental harm. To argue that only mitigation measures need be discussed overlooks the fact that alternatives are a type of mitigation.” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 403.)

The Green Hotel Apartments Final EIR dated June 2015 included a reduced density alternative called the “Smaller Scale Alternative” that would have reduced historic resource impacts. (FEIR, p. 3-25; p. 1-5 [addressing Reduced Height Alternative.]) This alternative must be analyzed.

4. All of the Project’s Potentially Significant Environmental Effects must be Comprehensively Addressed in an EIR.

The City must address the full range of impacts that the Project as proposed will have. A SCEA is not intended to address all potential significant impacts of a proposed project. A SCEA is only intended to address certain specified impacts on the theory that transit-oriented development is to be encouraged despite impacts it may have.

An EIR must comprehensively identify and address all of the “significant environmental effects” of a proposed project. (Public Resources Code § 21100(b)(1); CEQA Guidelines § 15126.2.) Both “[d]irect and indirect significant environmental effects” must be analyzed, “giving due consideration to both the short-term and long-term effects.” (CEQA Guidelines § 15126.2(a).) In addition to the aesthetic and historic impacts, it will be critical for an EIR to address impacts in the areas of biological resources, air quality and human health, traffic and access, and land use plans.

We and others have submitted comments on prior proposed versions of the current project, which had been undergoing environmental review that included preparation of a draft and final EIR.

a. Air Quality and Human Health Could Be Adversely Affected.

The SCEA states that 45,500 cubic yards of grading soil export and use of construction equipment is planned. (SCEA, p. 4.0-28.) The extent and nature of the construction activities will likely lead to extensive air quality impacts. With nearby sensitive receptors such as the Hotel Green Apartments, Castle Green, and the Children's Park Playground in Central Park, avoiding or mitigating air pollution impacts to the fullest possible extent will be critical.

b. Land Use and Planning Impacts must be Addressed.

The Central District Specific Plan should guide development in this area. The SCEA dismisses the possibility of project conflicts with this plan in a one page conclusory discussion. (SCEA, p. 4.0-104.) The conclusion is not based upon sufficient examination of the Plan's requirements.

The Central District Specific Plan requires that infill construction should be consistent with existing buildings (page 99); view corridors should be protected (page 132); and well-defined open space should be created (page 147). Other requirements apply as well. These and the Central District Specific Plan's other requirements should be fully explained and applied to the project before the City considers consistency of the project with this fundamental plan.

SCEA Appendix A - Incorporation of Applicable Mitigation Measures, Performance Standards and Criteria from Prior Applicable EIRs - lists the Connect SoCal 2020-2045 transportation strategy and the City of Pasadena General Plan EIR in the introductory paragraph. It does not list the previous 2014-15 project EIR as contributing to mitigation measures. Thus, the mitigations proposed in Appendix A do not rely on the previous uncertified EIR.

The sixty-eight SCEA mitigation measures largely depend on the Connect SoCal 2020-2045 strategy (including 45 measures or 66% of all included measures), far less than on the Pasadena General Plan/Central District/Old Pasadena Plan (23 measures, or 34% of all measures).

The SCEA could be in direct conflict with the Inclusionary Housing Ordinance Objective 7: "...infill... that respect existing resources will be encouraged."

The SCEA is also in direct conflict with the Central District Specific Plan objectives of Design Review in three steps if the Design Commission is not the lead decision-making body and final word. In a prior review process for the Green Hotel

Apartments Project, City staff member Kevin Johnson stated at the April 8, 2013 scoping session that the Design Commission would be the ultimate decision making body.

c. Traffic and Safety Access Issues must be clearly addressed rather than Relegated to an Appendix in the SCEA.

The Project as proposed will severely impact Dayton Avenue, a small street that already strains under its traffic burden. (2015 Green Hotel Apartments Project Final EIR, p. 1-13 [stating “the increased traffic introduced along Dayton Street between Fair Oaks Avenue and Raymond Avenue would constitute a significant impact” for which there is “No feasible mitigation” so it is a “Significant and unavoidable” impact].) An EIR must thoroughly assess traffic impacts to this and other local roads around the Project site. Fire Department safety and access must be critical subjects of an EIR.

With our prior March 10, 2014 letter about the prior project proposal on the site, we submitted a traffic and impact analysis prepared by Tom Brohard. This analysis is incorporated by reference, since project impacts will be similar.

The SCEA has a section in the Transportation Appendix (Appendix G) that is called "Transportation Impact Analysis - Outside of CEQA Analysis" (dated 5/3/2019) (Appendix G *PDF pg. 511-527*) that uses updated data to analyze three street segments and four intersections. It *fails* to look at South Fair Oaks segment from Dayton to Delmar, and *fails* to look at *unsignalized* Dayton/Fair Oaks & Dayton/Raymond intersections - inadequacies pointed out in 2015 EIR documents. It also omits Fair Oaks Avenue segment from Dayton to Green street that *was* included in 2015 EIR, which means SCEA omits meaningful Fair Oaks Avenue segment and daily trips analysis.

In the attachment, Table 5 and 6, page 10 (*PDF pg. 524*) of this section in the report states that the Dayton Street Roadway Segment again fails because the Vehicular Increase in ADT is 82.6%. 2019 figures show that *existing* daily trips have risen from 883 (2013) to 1,049 (2019), and this larger SCEA Project generates 866 new daily trips, causing the failure of the Dayton Street Segment.

The SCEA relies on 2013 and 2015 data from the uncertified 2015 EIR. The SCEA also has three traffic sections in the Appendix G (Transportation) that rely on possibly outdated bike and pedestrian issues, and the 2015 FEIR showed 64 units creating an additional 693 daily trips on Dayton segment, a 77% increase, while SCEA project volume shows net 866 new trips (SCEA Appendix G, p. 12), a 83% increase, after reducing Gross Total trips of 963 (92% increase) with transit credits, et cetera. Existing daily trips on Dayton were 883 in the 2015 EIR.

The ‘cumulative projects’ analysis that the SCEA omits from the main document

(in the Outside CEQA portion of Appendix G in the SCEA) is using 2013 data, clearly not adequately reflective of anything relevant to today's Pasadena.

The SCEA deprives the public of a proper understanding of the traffic impacts the proposed project would have. Instead of an SCEA, the City should update the EIR and subject it to proper public review and participation with comments and responses.

The SCEA allows Traffic and Transportation issues to be avoided when considering significant impacts. In order to qualify for an SCEA, the public agency must certify that there is sufficient infrastructure in an area. (Pub. Resources Code s. 21155.1 [requiring certification that "The transit priority project and other projects approved prior to the approval of the transit priority project ... can be adequately served by existing utilities."]) Roadways are part of the existing public utility infrastructure that must support a project. Yet the SCEA refers to the 2015 FEIR that analyzes the 2015 Project:

- Contains less than 75% of the number of units of the 2021 SCEA Project.
- Contains less than 80% of the square footage of the 2021 SCEA Project.
- Contains less than 25% of the parking spaces of the 2021 SCEA Project.
- Produces 20% less daily car trips of the 2021 SCEA Project.
- Has one less excavated level of parking than the 2021 SCEA Project.

The SCEA relies on uncertified Transportation information from 2013 and 2015, outdated materials for this NEW project. The City cannot have it both ways by a) utilizing SCEA for a "new" project, but relying on 2013 data from a previous uncertified EIR from a smaller project that was never supported or affirmed.

The SCEA relies on Bicycle/Pedestrian mode studies on Dayton Street to say that no mitigation or improvements are needed, yet it is clear that Dayton Street configurations must change to handle the 83% increase (about 853 trips in excess of City's limit for this roadway segment per 2015 EIR's smaller project), and there are no required or proposed Dayton Street or intersection mitigation. APX G, PDF pg. 75, 77. Additionally, it appears that no PEQI or BEQI was performed on any other roadway segment. (See SCEA Appendix G, p. 13.)

The SCEA relies on HCM Signalization Intersection Capacity Analysis (Apx. G, PDF pg. 57-73), yet ignores the dangerous and challenging unsignalized intersections at Dayton/Fair Oaks (split configuration) and at Dayton Raymond. Therefore, by omission, the SCEA incorrectly and inadequately concludes that there are no intersection issues, just as the uncertified 2015 EIR did.

In fact, the SCEA's abbreviated traffic studies fail to study, let alone suggest needed mitigation for, the two critical unsignalized intersections at both ends of the

significantly impacted Dayton Street Segment. (Appendix G, 5/3/19 Transportation Impact Analysis (PDF pg. 42). This analytical failure occurs again as in the challenged and uncertified 2015 FEIR.

Fair Oaks Avenue driveway is stated to be "... in direct *contrast* to the City's Street Design Guidelines." (January 22, 2018 Predevelopment Plan Review for City Council – Doc.) But it is not in *conflict*, and no data is provided to support the City's rejection outright. Being "in contrast" does not disqualify a Fair Oaks driveway, which suggests the SCEA (and previous EIR) should have studied this option. The City knows that the project's impact on the Dayton Street Segment was significant with the smaller 2015 project, and is far more significant for the current Project under SCEA review. In both, no mitigation is considered, let alone studied.

Bicycle parking with no bike improvements required or mandated, despite the unsafe existing unsignalized intersection conditions at the split Dayton/Fair Oaks intersections, does not mitigate impacts. Pedestrian review when no crosswalk or safety improvements are required or mandated, despite the horrible intersection conditions at the split Dayton/Fair Oaks intersections does not mitigate impacts.

d. The Current Proposed Project Continues a Prior Proposal but the SCEA Provides Insufficient Information.

The history of proposals at the project site is relevant to the City's current recommendation to the City Council about environmental review, and to the Commission's ultimate review of the Project presentation. In 2011, initiating the Central Park Apartments, ARG presented three possible development schemes to the public. "Scheme C" was described as similar to Colonel Green's 1903 concepts, and was encouraged for exploration. However, G&K rejected it outright. This history is relevant because today's SCEA project is claiming to be some sort of reincarnation of the "1903 vision" by G&K, yet today's overbearing Project is significantly *not* anything like the respectfully smaller Scheme C.

In 2013, an EIS for the revived Project was roundly panned in public scoping sessions, yet G&K proceeded to the DEIR in 2014, which by evidence of the public and Design Commission's comments all had extensive concerns and questions, and a general consensus that this inadequate DEIR that failed to address any 2013 concerns *and raised further additional concerns* that mushroomed with the 2015 Revised Draft EIR and Final EIR hearings. The SCEA makes no mention of the prior history of project proposals for this same Project site. (SCEA, p. 3.0-5 ["prior applicable EIRs" named are "SCAG Connect SoCal... EIR, the City of Pasadena General Plan EIR, and the Central District Specific Plan EIR"; no others are identified].)

In 2017, there was a Design Commission Preliminary Review with a reduced set of plans and 13-page staff report. In 2018 there was a Predevelopment Plan Review before the City Council. At both reviews, more questions arose as to the massive size and impacts and poor level of design. It was obvious that the 1903 concepts were being left back with 2011's Scheme C.

There is a failure that continues to expand today with G&K's failure to heed many public or previous Design Commission concerns and questions with a new, larger SCEA project demanding less transparency and public review.

Since the 2021 Central Park Apartments Project still relies on the *uncertified* 2015 FEIR (and 2013 data) with uncertified responses to all of the public comments, the SCEA is inappropriately applied to this oversized 2021 Project. The SCEA avoids identification and study of standard, critical environmental issues:

- No Alternatives are put forward;
- No Known Areas of Controversy are addressed, despite 11 identified in the 2015 DEIR, as well as at least 9 additional concerns from public comments (6 noted in the DEIR and at least 3 more from the public comments). All of the 2014-15 "areas" apply.
- Additional Areas of Controversy noted in the 2015 FEIR Public Comments are relevant but are not mentioned or studied.
- Specific Issues to be Resolved in the 2015 FEIR are not identified or addressed, let alone resolved.
- No Cumulative Development Impacts are identified or studied. The 2015 FEIR relies on 2013 Cumulative Projects, 2013 city population and other now-outdated 2013 transportation facts. The significantly larger 2021 Project relies on outdated 2013/2015 data, despite far more Cumulative projects through 2021+.
- The SCEA contains an inapplicable (and possibly inaccurate) "Outside of CEQA Analysis" section that proves the 2021 Project is detrimental to the Dayton Street Roadway Section, yet fails to study adjacent Dayton Street intersections or request mitigation. It studies less than the 2015 EIR, yet today's Project presentation is far bigger.

The 2015 DEIR's Section 4.0 Environmental Checklist is 103 pages, more than 236% the size of SCEA's Section 4.0 Environmental Checklist of just 55 pages, despite the larger, more complex and arguably more impactful 2021 Project. The SCEA fails to provide adequate review of environmental impacts.

The SCEA relies on a minimized, subjective and unproven Environmental Checklist in analyzing environmental impacts, while its Appendices rely on 2015 and 2013 data that require updating for this larger Project presentation.

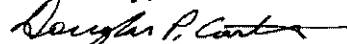
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Additional informational deficiencies and inadequacies of the SCEA are detailed in comment letters that were submitted for the prior Green Hotel Apartments project, incorporated by reference.

Conclusion.

The City should require completing the previously-initiated EIR review process rather than switching to using the SCEA process for the proposed project. While the Design Commission is the approval authority for the proposed project, it will need to rely on the environmental review process (whether completing the EIR or switching to the SCEA) that the City Council chooses. We strongly urge the City Council choose the EIR process. The project as proposed can have profound impacts on the future of the City. It must be fully understood and appropriately mitigated with fully informed involvement and consideration by the public, public agencies, and decision makers. The only way to ensure that occurs is through completing the EIR review process.

Sincerely,



Douglas P. Carstens

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Enclosure:

1. Transcript of February 22, 2022 Design Commission Hearing

ENCLOSURE

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TRANSCRIPT OF CITY OF PASADENA DESIGN COMMISSION HEARING
Commission Hearing
Pasadena, California
Tuesday, February 22, 2022

Transcribed by: Amanda Eastwood

1 Srinivas Rao: Good afternoon, everyone. This is the time and place set for a special meeting of
2 the Design Commission of the City of Pasadena. My name is Srinivas Rao and I will be the
3 chairperson for this hearing. Can we take a roll call at this time?

4 Planning Department (Left): Yes. Commissioner Toro? Commissioner Toro is not here at the
5 moment.

6 Srinivas Rao: I think he's just joined.

7 Planning Department (Left): There he is. Commissioner Toro is present. Commissioner Sales.

8 Timothy Sales: Present.

9 Planning Department (Left): Commissioner Lipira. Commissioner Hawthorne.

10 Christopher Hawthorne: Here.

11 Planning Department (Left): Commissioner Delgado.

12 Julianna Delgado: Present.

13 Planning Department (Left): Commissioner Chiao.

14 Philip Chiao: Here.

15 Planning Department (Left): Commissioner Carpenter.

16 Robert Carpenter: Here.

17 Planning Department (Left): Commissioner Sepulveda.

18 Yolanda Sepulveda: Here.

19 Planning Department (Left): And Chair Rao.

20 Srinivas Rao: Here.

21 Planning Department (Left): OK. We have a forum.

22 Srinivas Rao: Thank you very much. I would now like to go over the procedures we will follow.
23 Please take notice that the following meeting will take place solely by teleconference,
24 videoconference. For public hearings and action items, the staff will present their
25 recommendations. After the sa-staffs presentation design commission members will ask
26
27
28

1 questions of staff. The applicant will have up to 15 minutes to speak and answer questions we
2 may have. Members of the public will have up to three minutes to provide live comment
3 pursuant to the process outlined on the public agenda. A five minute rebuttal period will be
4 provided to the applicant. After public comment is complete. I will close the public hearing
5 discuss the merits of the re, the recommendation and make a decision. All votes will be taken
6 via roll call vote. With that I would like to turn our attention to the next item on the agenda, um,
7 which is um roll call. Um.

8 Kevin Johnson: Um, minutes chair.

9 Srinivas Rao: Yes, um, hang on, uh, sorry. I have, I'm doing this from the computer. OK.
10 Number two, item two on the agenda approval of meeting uh minutes from uh January 11, 22.

11 Julianna Delgado: So moved.

12 Srinivas Rao: Is there a second there?

13 Robert Carpenter: Second.

14 Srinivas Rao: Can we have a vote please?

15 Planning Department (Left): Commissioner Toro. Commissioner Sales.

16 Timothy Sales: Yes.

17 Planning Department (Left): Commissioner Lipira.

18 Stephen Lipira: Abstain.

19 Planning Department (Left): Commissioner Hawthorne.

20 Christopher Hawthorne: Yes.

21 Planning Department (Left): Commissioner Del-Delgado.

22 Julianna Delgado: Yes.

23 Planning Department (Left): Commissioner Chiao.

24 Philip Chiao: Yes.

25 Planning Department (Left): Commissioner Carpenter.

26

1 Robert Carpenter: Yes.

2 Planning Department (Left): Commissioner Sepulveda.

3 Yolanda Sepulveda: Abstain.

4

5 Planning Department (Left): Commissioner Rao.

6 Srinivas Rao: Abstain, I was absent that day.

7 Planning Department (Left): Minutes passed.

8

9 Srinivas Rao: Thank you. Um. And then uh we move on to the next um m-minutes from January
10 25th, 2022. Is there a motion to approve.

11 Christopher Hawthorne: I'll move chair.

12 Srinivas Rao: Thank you. Is there a second?

13 Julianna Delgado: I'll second.

14 Srinivas Rao: Thank you. Christopher, Delgado, can we have a roll call please.

15

16 Planning Department (Left): Commissioner Toro.

17 Jose Noel Toro: Yes.

18 Planning Department (Left): Commissioner Sales.

19 Timothy Sales: Yes.

20

21 Planning Department (Left): Commissioner Lipira.

22 Stephen Lipira: Yes.

23 Planning Department (Left): Commissioner Delgado.

24 Christopher Delgado: Yes.

25

26 Planning Department (Left): Oh and uh Commissioner Hawthorne.

27 Christopher Hawthorne: Yes.

28

1 Planning Department (Left): Uh, Commissioner Chiao.

2 Philip Chiao: Yes.

3 Planning Department (Left): Commissioner Carpenter.

4 Robert Carpenter: Yes.

5 Planning Department (Left): Commissioner Sepulveda.

6 Yolanda Sepulveda: Abstain.

7 Planning Department (Left): And Commissioner Rao.

8 Srinivas Rao: Yes.

9 Planning Department (Left): OK, minutes passed.

10 Srinivas Rao: Thank you very much. Uh. And uh let's move on to item three advisory review
11 sustainable communities environmental assessment. Um. Kevin.

12 Kevin Johnson: Thank you chair. I'll be giving the uh presentation for this item so let me bring
13 up the the presentation quickly um and then we'll run through this. OK, um, as I state that this is
14 uh an advisory review of a sustainable communities environmental assessment that's been
15 prepared by the city for the 86 South Fair Oaks Avenue Project. Um. This was directed by the
16 city council at its meeting of January 24th. And were considered the the the document and
17 requested that the design commission conduct an advisory review of the environmental
18 document before the council takes action on uh on the document. Um. The project location is at
19 uh 86 South Fair Oaks Avenue which is shown here in red, at the north east corner of Fair Oaks
20 Avenue and Dayton Street, uh directly north of Central Park, and adjacent to the Castle Green
21 and the Green Hotel. Um. Both historic resources listed in the National Register, as well as
22 within the old Pasadena Historic District. The project site is about three quarters of an acre and
23 currently serves a surface parking area and outdoor recreation space for the Green Hotel
24 apartments um adjacent which is under the same ownership as the current property. Um, it also
25 uh contains an outdoor advertising billboard. Um. As I mentioned, it is located within the old
26 Pasadena Historic District and the Green Hotel individual National Register listed site. Um.
27 However, there are, the the property is non-contributing to the district and there are no historic
28 resources on the site. The project proposes demolition of the existing facilities on the site and
construction of a mixed use project with 6200 square feet of ground floor commercial and
restaurant space. Four work live units are approximately 1300 square feet each, uh 84 residential
units including 84, or excuse me, eight very low income units, um, and the building is proposed
to be six story's ranging from 32 feet to 90 feet using height averaging. This is an image uh
rendering uh artist rendering from uh the applicants submittal showing the proposed new project

1 here at the corner um within its uh existing context. The project requires review and approval of
2 the sustainable communities environmental assessment which we'll call SCEA moving forward.
3 Um, review and approval of the SCEA by the city council. Um, the simple guidelines require
4 that the legislative body of the lead agency take action on SCEA um so the City Council is the
5 final review authority for for the document. Following the Commission's action or the the
6 council's action, excuse me um, concept design review by the design commission will be
7 scheduled and then final design review after that, uh followed by building permits. Um, so to
8 briefly explain the uh the SCEA, uh, the SCEA process was established under SB 375 um and
9 establishes specific criteria that a project must meet in order to be eligible for a SCEA, um it is it
10 has to be considered a transit priority project, which includes at least 50% residential use, and
11 that density of 20 units per acre and location within a half mile of the major transit stock. Um. In
12 the staffs analysis, we found that the project does meet all of those criteria. SCEA also requires
13 compliance with the applical applicable goals and policies from the from SCAG's 2016 regional
14 transportation plan and sustainable communities strategy. And uh the SCEA document uh
15 provides all the background information to demonstrate that this project is in compliance with
16 the goals and policies of that document. Um the the SCEA also requires that the project
17 incorporate all feasible mitigation measures, performance standards or criteria from prior
18 applicable EIRs. And the SCEA document also analyzes all of those uh mitigation measures,
19 standards and criteria from the general plan and central district specific plan EIRs and finds the
20 project to be in compliance with those as well. The SCEA analyzed potential impacts to 20
21 environmental impact areas that are required to be analyzed under CEQA for all projects.
22 Potential impacts were found related to cultural resources, noise and tribal cultural resources.
23 Um, the SCEA found that there are feasible mitigation measures that would reduce all of those
24 potential impacts to less than significant levels. And that all other impacts and all of the other
25 topic areas that were evaluated were found to be less than significant. Um, the draft SCEA was
26 released for public review from March 8th of 2021 to May 6th of 2021. And we received a
27 number of comments during that period from uh three state and local agencies, eight
28 organizations and 45 individuals. And uh we prepared master responses to some of those uh
comments. Some of the common comments that we received in those uh comment letters in
section seven of the SCEA. And there are also some minor edits that were made to the SCEA to
address those public comments, none of which affected the conclusions of the environmental
review. Uh. There are some public comments that have been received tonight that uh I thought
would be important to address um right off the bat uh before um we move into the discussion.
Um, there were a lot of comments that were received uh that refer to previous projects, uh,
previous iterations of projects on this site, um as well as previous previous environmental
analysis that has been conducted for those previous iterations of a project. Um, and I wanted to
point out that this current SCEA analysis is not based on any data or studies from any previous
iteration of a project on this site. The those previous projects were withdrawn by the applicant,
and this is the current project that's under consideration. And all of the analysis that's prepared in
the SCEA is based on this new new project scope. The previous prepare previously prepared
EIR for the previous project is n-now irrelevant to the new project scope. Uh, that project was
withdrawn. Um, in addition, um, there were comments made that this building is taller than the
Castle Green and the Green Hotel apartments, which is not the case, there were diagrams that

1 were provided in the SCEA, to document that, um. I do have those in the presentation if you'd
2 like to see those, um but they were in the in the SCEA document. Um. In addition, um related to
3 the transportation analysis, um, it concluded that none of the CEQA thresholds of significance
4 are exceeded by the project. Um, the the project did require a study of performance metrics
5 outside of the CEQA thresholds and conditions of approval um are recommended, which would
6 be tied to the Design Review decision which will come to you at a later date, um to manage
7 project trips and uh protect the neighborhood. Um. A summary of those conditions include a
8 transportation to management plan, uh demand, excuse me, transportation demand management
9 plan. Unbundling of residential parking, discounted Metro passes to residents, bus stop
10 improvements and um prohibition from issuing permits for overnight street parking for residents
11 of this project. Um, so staff has concluded that the project meets all the criteria for a SCEA
12 under the CEQA guidelines and that all impacts that were identified in the SCEA would either
13 be um less than significant or can be mitigated to less than significant levels with the mitigation
14 measures that have been proposed. So staff's recommendation is that um the design commission
15 recommend that the Council adopts the SCEA and the SCEA findings and the mitigation
16 monitoring reporting program. Um, and uh that they would file a notice of determination uh
17 with the county recorder. Following the council's action on the SCEA, the project, um, as I
18 mentioned would then be scheduled for a public hearing before the design commission for the
19 concept design review um to review the project design itself. That concludes the site
20 presentation, um, I do want to introduce um some other staff members and consultants that we
21 have um on the on the call and I'll bring some of them in as uh panelists for any questions that
22 you may have. Um, we do have Teresa Fuentes, our assistant city attorney who is our CEQA
23 legal expert, um who's on the call with us, as well as John Bellis, our um CEQA uh consultant.
24 Uh. We have Conrad Viana and Nadir Osmia from uh the Department of Transportation who
25 can answer any technical questions on traffic and transportation issues. Um, and then we also
26 have our consultants who prepared the environmental documentation. Uh, Lynne Kaufmann, the
27 project manager from Impact Sciences as well as Brett Pomeroy who is our uh their expert on
28 air quality, noise and greenhouse gas. And we also have Paul Travis from Historic Resources
Group who can help with any uh cultural resources questions the commission may have. Um, so
with that, um I'd be happy to answer any questions um and uh I'll bring in the uh –

21 Robert Carpenter: Chair.

22 Kevin Johnson: Other stuff.

23 Srinivas Rao: Yes, Co-Commissioner Carpenter, go ahead.

25 Robert Carpenter: Yes, um, Kevin, thank you for the presentation. Uh, is this considered our
26 preliminary design review because we would come back as concept design review.

27 Kevin Johnson: No, there was already a preliminary consultation conducted for this project
28 several years ago so this is a this is a different review, this in this case we're just reviewing the

1 environmental documentation um under the SCEA and providing any um recommendations to
2 council on the environmental documentation only, not the project design.

3 Robert Carpenter: So I understand what we're doing today but when it comes back, it will be a
4 concept design not preliminary, right?

5 Kevin Johnson: That's correct.

6 Robert Carpenter: And why is it not preliminary after this?

7 Kevin Johnson: Uh, because that has already been conducted.

8 Robert Carpenter: But that was another project, right?

9 Kevin Johnson: No, no, that was for this project.

10 Robert Carpenter: All right. Then I didn't see it. OK. Thank you very much.

11 Kevin Johnson: Sure, yes, that was before you uh returned to the commission. Correct.

12 Robert Carpenter: OK.

13 Srinivas Rao: OK. Thank you. Commissioner Delgado, go ahead.

14 Julianna Delgado: Thank you. Um, thank you, Chair. So I have um four procedural questions.
15 And I think, Kevin, you may have already answered one of them. The design commission has no
16 discretionary authority so this is just an advisory review. And only the City Council can render a
17 decision on this. Why was it not remanded to the planning commission, which typically reviews
18 large environmental documents and has expertise in environmental review? Why the design
19 commission?
20

21 Kevin Johnson: Well, uh, I can't speak to the the council's reasoning necessarily, although um
22 the design commission is a commission that is authorized to take action on environmental
23 documentation and does routinely do that in design review cases where um there aren't any
24 zoning entitlements required for the project, um, as is the case for this project. Um, so it's, um,
25 it's common, uh, it's more typical for this commission to review um categorical exemptions um
26 for for infill development projects, um such as this, but in this case, um we uh conducted a more
27 robust um SCEA analysis, um rather than doing a a categorical exemption, which it could have
28 potentially qualified for. Um, so like I said, I-I can't speak to the council's determination on
sending this to the design commission, rather than the planning commission but uh with the
design commission is the review authority for this project, and there are no entitlements that are
required for it so uh so that could be one of the reasons why they sent it to the design
commission.

1 Julianna Delgado: OK.

2
3 Theresa Fuentes: Miss Delgado, if I if I could jump in, this is Theresa. [CROSSTALK]. I was at
4 the council um meeting where they decided to send it to the design commission.

5 Julianna Delgado: Me too.

6 Theresa Fuentes: Right. And one of the reasons that they did was because you all would see it
7 later so they frankly thought that you all might have um a more vested interest in reviewing um
8 this environmental document than the planning commission, which would not see the project
again so there was that consideration as well.

9 Julianna Delgado: All right, that makes sense. Thank you. I have three more questions. Um.
10 Does the meeting tonight constitute uh part of the city council's continued public hearing um
11 since the council is the sole authority? And then what all of the documentation would all of the
12 folks who are going to give testimony tonight would they need to redo that or do they close the
public hearing? Is this a continued public hearing for the council?

13 Kevin Johnson: Yes, it is a continued hearing from what I understand, yes.

14 Theresa Fuentes: And I'll jump in again, as well, just to assist um Kevin. So the folks who are
15 providing um testimony tonight need not show up again if they don't want to, this is all part of
16 one administrative record um so their comments will be considered as part of the administrative
17 record for this entire project. Um so they're welcome to show up again um at council if they'd
like, but their comments tonight do count as part of the administrative record for this project.

18 Julianna Delgado: OK, thanks for clarifying that. Um, I think, Kevin, you already answered this.
19 Um. There was some concern um from the public about um uh regarding the previous 2015 EIR
20 and why the applicant was providing a SCEA and not a revised EIR but I think you clarified that
this is a different scope and this is basically a brand new project, is that correct?

21 Kevin Johnson: Yes, that's correct.

22
23 Julianna Delgado: OK, thanks. So also, um the last one, it's my understanding that the municipal
24 services committee recently um approved um uh DOT changing metrics to understand traffic
25 analysis and traffic impacts. So is this project subject to the the new traffic impact analysis? And
26 if so, is it appropriate for the commission to recommend a revision of the analysis based on the
latest decision?

27 Kevin Johnson: Uh, I'm going to uh ask Conrad Viana with Department of Transportation to uh
28 answer the first part of that question with re with respect to any new thresholds that may have
been reviewed recently. Conrad, can you shed some light on that?

1 Conrad Viana: Yes, good afternoon, the City Council approved the updated uh threshold CEQA
2 thresholds in November 2020. So this project is not uh for all new projects that um have been
3 submitted and deemed complete since February 14, 2021, the new thresholds would apply.

4 Julianna Delgado: So uh [INAUDIBLE] within the last two weeks, the municipal services
5 committee of the council recommended fu-further changes so are those changes, is it appropriate
6 for this commission to say that the see, the SCEA needs to be revised to to look at those um
7 changes? Or are they excluded from it because they applied earlier than those changes.

8 Conrad Viana: The municipal services committee meeting two weeks ago was involved in the
9 outside CEQA analysis and it is not yet approved by city uh and reviewed and approved by City
10 Council. So this project does not apply to the updated outside CEQA um uh methodology.

11 Julianna Delgado: OK. Thank you so much for clarifying. Those are all my questions.

12 Srinivas Rao: OK. Thank you. Yes, Commissioner Lipira. Um, you need to unmute yourself.

13 Stephen Lipira: Thank you. Uh. First of all, I want to thank staff and everyone involved. I think
14 your presentation and all the material that's provided was excellent. A little bit overwhelming,
15 but it was still very good and I enjoyed having access to that. My question, this is just for
16 clarification, it's my understanding that this is only the second SCEA uh that our city projects
17 have undertaken, the first being Space Bank, I definitely can understand why that would fall into
18 this. But with this one going the route of the SCEA because of of the transit priority project
19 because it fell into that, is that why it's going SCEA?

20 Kevin Johnson: Yes, that's correct.

21 Stephen Lipira: And then the reason why, I think you answered that, you did say that the EIR
22 came up several times. Now you're saying there wasn't an EIR for this project, correct, because
23 the other ones had been scrapped?

24 Kevin Johnson: That's correct. Um, the EIR that was prepared for the previous project scope is
25 no longer valid because that project is no longer under consideration.

26 Stephen Lipira: Very good. Thank you very much.

27 Srinivas Rao: Thank you. Any other questions? Yes. Commissioner Sales?

28 Timothy Sales: Um. So uh and I'm just curious is is the is the request for a SCEA is that directed
by city staff or is that an applicant request?

Kevin Johnson: The city determines the appropriate environmental documentation for every
project um so the city made the determination that the SCEA was the appropriate document for
this project.

1 Timothy Sales: Right, because there is some discussion in in you know, some of the ca- uh,
2 some of the dialogue in this voluminous report about it, you know, being akin to a mitigated
3 negative declaration, and the outcome does feel very much like that, uh. So that's, it's it's a new
4 thing to me but I understand that. I think that I also understand that the SCEA is tied to trying to
5 create a more certain and somewhat more streamlined approach to projects that meet certain
6 thresholds, as you demonstrated for providing affordable housing and density in certain kinds of
7 locations. Is that correct?

8 Kevin Johnson: Um, I-I don't think it's specific to affordable housing, it's really about um it
9 being, uh, you know, having a certain number of housing units and and percentage and density
10 um in close proximity to transit.

11 Timothy Sales: Right. And then lastly, would you, in your presentation you have I didn't get a
12 chance to take a screenshot and I didn't get it in the in the uh, there was, so this is a a SCEA in in
13 support of a trend a TPP, transportation priority project. And could you - At the very end, I think
14 we're going through some points I did not see discussed or I missed in the primary document
15 about certain um TDM measures. Uh, could you possibly go back to your presentation and put
16 that back up on the screen?

17 Kevin Johnson: Sure. Uh. That was just a brief, um, a-a brief explanation of um the the different
18 traffic um metrics for, excuse me, sorry.

19 Timothy Sales: I un, I understand.

20 Kevin Johnson: There's the there's the analysis that's conducted under the CEQA thresholds to
21 determine if it if it if the project exceeds any of the adopted transportation thresholds under
22 CEQA and then there's a separate outside of CEQA review that's conducted to determine if any
23 other conditions of approval are needed to um manage the project trips and project protect the
24 neighborhood. And so with that separate study, there are some conditions of approval that are
25 recommended by the Department of Transportation and one of those is uh a TDM plan. Um,
26 those will be coming to the commission during concept design review as as the part of the
27 recommended conditions of approval for the project.

28 Timothy Sales: So where where are these, uh, where are these items documented in the in the
environmental document?

Kevin Johnson: There are not documented in the environmental document because they're
they're, uh, it's an analysis that's not related to the CEQA threshold so it's a it's a separate
analysis that the Department of Transportation conducts, and then those conditions -

Timothy Sales: No, I'm familiar with that. OK.

Kevin Johnson: Later in the process.

1 Timothy Sales: OK, well, that's it. Thank you. I, and I'm TAC representative and and and so I
2 should be smarter than this, but [CROSSTALK].

3 Kevin Johnson: Sorry.

4 Timothy Sales: It it is a very - I'm sorry. It's OK, Kevin, thank you for clarifying. I think that it's
5 super important because, you know, I had another [INAUDIBLE] question, which maybe you
6 know the answer to, maybe you don't. To what extent, I saw unbundling of residential parking,
7 which is a good one, which means that they have to pay for it separately, which makes sure that
8 people really, you know, value it. Do you know off the top of your head or can find out to what
9 extent this project is uh deviating on on lowering the number of parking spaces per unit versus
10 the development code? Are they providing all the parking that's required in development code?
11 Or have they opted to do less than development code because they are invoking a process which
12 is meant for transportation priority projects, which which would mean to suggest that they
13 believe in these TOD related uh policies? I'm curious to know if if if they have come down in
14 the number of parking spaces that's required in code?

15 Kevin Johnson: Yes, thank you. That's a great question. Um. Yes, the the applicant has um given
16 some thought to that um question. It was something that was brought up during the the SCEA
17 review in the public comments, and they have considered and actually submitted a revised
18 project that reduces the number of parking spaces, um you know, based on what's allowed in the
19 code um for projects -

20 Timothy Sales: Required. Yes.

21 Kevin Johnson: Proximity to transit, so they're not reducing it below code requirements um but
22 they're they're proposing to reduce the parking, you know, within the range that's allowed by the
23 the code. And I I don't know the exact amount, maybe the the team could um provide some
24 some color to that. Um, but it doesn't affect the the environmental determination, um, it's just
25 one of the things that they're they're thinking about doing.

26 Timothy Sales: Sure but I would differ with you on it doesn't affect - I mean, I think it could
27 affect it to the positive, right. So I-I understand the environmental document and I understand,
28 you know - I guess they call those to kind of my next question which is provide us with some
guidance on what you're expecting us to do because, you know, we're not the certifying board,
uh, and it kind of feels like City Council has kicked us over to us to say, hey, what do you think?
Is this OK? Um, you know, and I think that we can say binary, yes, or we can say no, or we can
say we think it's OK with the following additions. And I think that, you know, that's where I
think our our, uh, you know - And then of course, we're going to see transportation, we're going
to see the design later but I think that in my experience kind of setting some of the expectations
in the environmental document are key to what the applicant can then reasonably say, hey, you
promised us this so the design has to facilitate that. So I mean, I think it is it is important that we
understand that this client, this applicant is dedicated to reducing the number of trips on site by

1 reducing the amount of parking, there were a lot of good public comments about impacts on that
2 tiny little street. Um, and so, uh you know, I think we can we can follow up with the applicant
3 but to my latter part of the question, and I your your answer was very reasonable Kevin, thank
4 you for that. My my further question is, can you give us any guidance and be traced on what
5 what you're expecting, you know, us to do is clear in your staff report, you want us to basically
6 say, yes, this is fine. But then with in regards to further delineation or direction, is there any
7 guidance that you can provide on what would be appropriate and helpful?

8 Kevin Johnson: Sure. Thank you. So I would say that um if if uh if you believe based on uh your
9 analysis or review of the document or any of the public comments that have come about um that
10 there are inadequacies in the environmental documentation that you think need to be addressed,
11 um, or that the City Council should consider that those would be important uh comments for you
12 to provide. Um, uh, if you think that the analysis is adequate, and follows all the CEQA
13 guidelines uh for the for the document, um as we've suggested in our report, um then you could
14 simply say we think the the analysis, you know, has been done adequately and we recommend
15 the council approve it. Um. But like I said, if you if you believe that there should be some
16 additional analysis in any particular topic area that's covered in the SCEA, then that would be,
17 you know, important to uh to note.

18 Timothy Sales: That's very clear. Thank you for that clari-clarification.

19 Srinivas Rao: Thank you. Yes. Commissioner Sepulveda, go ahead.

20 Yolanda Sepulveda: Um, just to piggyback off of the clarification that Commissioner Sales is
21 seeking, is it fair to assume based on um one of the qualifiers, um, Miss Montez provided and
22 what the requirements of a SCEA and CEQA are that context is also part of what our evaluation
23 as a commission um can address.

24 Kevin Johnson: Well, with respect to potential environmental impacts, um that would be
25 something for the commission to evaluate here as well. So if you believe that the project um
26 would have impacts on any of its surround, any of the buildings surrounding it, and that SCEA
27 didn't adequately address those issues, um then that that could be a comment that you could
28 provide. Um, there wouldn't be necessarily you know, how the design relates to the context it
29 would be more about whether the building, the construction of a new building in this location
30 would have any impacts on adjacent historic resources or or other, you know, things like that.
31 Um and there there is analysis in the report with respect to uh potential vibration impacts on
32 adjacent resources, as well as mitigation measures that have been put [INAUDIBLE]
33 incorporated to address that um so we believe on the staff side that we have adequately
34 addressed all of the potential impacts on offsite buildings. Um. But again, that's, you know, if
35 you feel that there's more analysis needed there or something that would be an appropriate
36 comment to provide.

1 Theresa Fuentes: And if I could step in super quick. Um uh, Commissioner Sepulveda, your
2 question is a good one. Um, context when you think of design is very, very different than
3 context when you think of environmental e-effects. And so I think I think Kevin gave you that
4 distinction. But again, just to emphasize the this, the distinction between design context versus
5 environmental effects.

6 Yolanda Sepulveda: Understood, and it sounds like in the three areas that were pointed out as
7 related to environmental context are the cultural resources, noise and tribal cultural resources
8 were areas that we're going to see some clarification on, correct?

9 Kevin Johnson: Those were areas that uh have mitigation measures proposed, and those were
10 included in the mitigation monitoring uh plan that was uh part of the document that that was uh
11 posted online for you to review.

12 Yolanda Sepulveda: Thank you.

13 Timothy Sales: Chair, I have a follow up when you get a chance?

14 Yolanda Sepulveda: You're on mute, Chiao.

15 Srinivas Rao: Commission Chiao you had a question?

16 Philip Chiao: Uh, Tim, why don't you go ahead first? You have a follow up question?

17 Timothy Sales: OK. So So, I I and I appreciate the, thank you very much, Commissioner Chiao.
18 I I guess further clarification then in the process because I think that the conversation in context
19 relates to setting which is actually one of the one of the dimensions of historic resources that's
20 addressed in the historic resources document that I want to engage upon. And I'm not sure, uh
21 Kevin, usually we just have you as our staff person. We have a lot more staff here, or consultant
22 staff. So what do you envision being the process for us to engage in um understanding uh
23 technical matters related to the documents presented? And uh is that was something we would
24 get into now or is that something we'll get into after something else happens?

25 Kevin Johnson: It might be better to um to go ahead and move to public comment and and hear
26 what the what the members of the public have to say. And then we can, you know, move into uh
27 whatever technical questions you may have about the analysis and and we can determine who
28 would be the best uh person on the team to answer those questions.

Timothy Sales: OK, then I'll wait for that. Thank you.

Srinivas Rao: OK. Commissioner Chiao, go ahead, please. Commissioner Chiao, go ahead.

1 Philip Chiao: OK. Tha-Thank you. Uh, I guess my question is, currently the project is a, in-
2 includes 84 units. My question is has alternatives been considered in terms of reduced units
3 which would be resulting in reduced massing and reduced skill.

4 Kevin Johnson: No, the the project has not considered uh alternatives um of of lower scale
5 project as part of this review. The SCEA does not require uh alternatives analysis, that's one of
6 the streamlining components of the SCEA, um so that's that's not a required uh study to be to be
7 conducted and they they meet what is allowed under the city's uh zoning code and general plan
8 and the specific -

9 Philip Chiao: OK. So as a follow up question in our architecture design review, uh based on
10 judgment [INAUDIBLE] its proportion scale and massing. Uh, in the past, we have at times
11 request request the developer and architect to reduce the units or reduce the height of building,
12 so is that still option for uh for us to to consider during the design review stage?

13 Kevin Johnson: Um the the the code does not allow the commission to reduce the project's uh
14 allowable density uh or residential units below what's what the what the zoning code allows, um
15 you could recommend further studies of massing alternatives of, you know, uh, redistributing
16 the massing around the site or, or other methods that may reduce the scale of the project, if you
17 feel that that's a concern. Um. But you would not have the authority to direct the applicants to
18 reduce the number of units that are proposed.

19 Philip Chiao: OK. Thank you.

20 Srinivas Rao: Thank you, Commissioner Chiao. Any other questions? I see none. OK, I I have
21 uh, those were all very good questions, answered a lot of questions I had. Um, one, couple other
22 questions I have. One is when did we a, when was the preliminary design review done?

23 Kevin Johnson: Um. That is a good question. I want to say it was um around 2018 or so. I don't
24 have that exact date in front of me, unfortunately.

25 Srinivas Rao: So So what the SCEA shows is consistent with the preliminary design proposal?

26 Kevin Johnson: So the the design that's shown in the SCEA is further developed from what the
27 commission reviewed at the preliminary consultation and is the design that has been submitted
28 for concept design review. So um so basically, what happens is they they go through preliminary
consultation, we get the commission's comments, and then they submit for concept design
review, and that's when the environmental review process starts. So what you're seeing in the
drawings is the applicants revised design based on the commission's preliminary consultation
comments.

Srinivas Rao: OK, so so um is it fair to assume that when it comes for concept design review,
we will have a chance to look at what Commissioner Chiao was alluding to in terms of massing
and views of the historic building and things of that sort?

1 Kevin Johnson: Yes.

2
3 Srinivas Rao: OK.

4 Kevin Johnson: That's correct.

5 Srinivas Rao: OK, very well. Thank you so much for answering all our questions. Any further
6 questions? No. OK. So, uh Kevin, um so we, there there is no further applicant presentation, we
7 just move on to comments uh from the public.

8 Kevin Johnson: We we don't have a formal applicant presentation, uh but the uh applicant
9 representative would like to address the commission, um so um if we want to start with that.
Um.

10 Srinivas Rao: Yes, please. Let's do that. Thank you.

11
12 Kevin Johnson: I will bring in uh Emily Taylor, um to uh address the commission. Emily, can
you hear us?

13
14 Emily Taylor: Yeah. Can you hear me?

15 Kevin Johnson: Yes, thank you. Please go ahead.

16 Emily Taylor: All right. Uh. Good evening, Commissioners. My name is Emily Taylor and I am
17 the director of development for Goldrich Kest. On behalf of the Central Park Apartments team, I
18 want to thank you for reviewing the environmental document for our project. We are really
19 excited about Central Park Apartments, a project that activates the co-, the corner of Fair Oaks
20 and Dayton, with a zoning compliant transit oriented development, adding 84 new apartment
21 homes, including 20% of base density reserved for affordable units, as well as neighborhood
22 serving retail. Our outreach on behalf of the project has been extensive, and the pr-project
23 reflects priorities shared with us by a diverse group of residents, community leaders and
24 business stakeholders. I'm also really proud to have receive such enthusiastic letters of support
25 for the SCEA from Pasadena Heritage, Pasadena Chamber of Commerce, and leaders including
26 Claire Voguard [ph]. Our architectural team is deeply rooted in historic preservation and
27 together we have worked incredibly hard to present a project that is a model we can all be proud
28 of. We have read the letters from several community members related to to design, which we're
happy to uh address at a later date when the project is again before the design commission for
conceptual design review, and as well as final design after the approval of the SCEA. The matter
before the commission tonight, however, is only the advisory review of the sustainable
communities environmental assessment that was completed for the project. Central Park
Apartments meets all of the criteria for this type of CEQA Review, thus complying with state
law, while also fulfilling the city's need for more transit oriented housing. We agree with the

1 staff report and its recommendations for the certification of the SCEA. Uh, and myself and our
2 project team are available for any additional questions that you might have tonight. Thank you.

3 Srinivas Rao: Thank you so much, Emily. Um. Any questions? I see none. All right. Thank you,
4 Emily, for, um the quick um presentation, or talk. Um. Should we open um it to um public
5 comments, please?

6 Kevin Johnson: Sure, yes, um, so any members of the public who are connected to the meeting,
7 if you wish to speak and provide comments to the commission, please click the raise your hand
8 button. If you're on the telephone, you can press star nine to raise your hand and uh we will call
9 on you. And um currently Chair we have two hands raised um so uh we'll go ahead and call on
10 the first uh person which is Mike Salazar, you want three minutes. Mike, can you hear us?

11 Mike Salazar: Yes.

12 Kevin Johnson: OK. Please go ahead.

13 Mike Salazar: Uh, thank you. My name is Mike Salazar. I'm a former three turn, three term
14 Pasadena design commission member so I have a feeling of what what this commission is going
15 through. Um. This commission has been the lead authority on a project for this site since
16 actually 2008 when the very first blockbuster project came up. Uh, in my letter, I included a
17 brief overview but it sounds like with this SCEA there's so much confusion uh and conflict of
18 what the design commission traditionally uh is allowed to do in reviewing projects. Um. This
19 the SCEA, reading from uh the SCEA document says the intent of SCEA of CEQA streamlining
20 provision is not to undercut or circumvent CEQA requirements, but rather to reduce
21 documentation and redundancy and to provide an incentive for transit projects. It it is curious uh
22 this society and transit project yet we know based on the previous versions of a smaller uh 64
23 unit project uh that there would end up being severe traffic impacts on Dayton Street. Um. We
24 don't know how severe those impacts would be on the unsignalized adjacent intersections of Fair
25 Oaks and Raymond because they were not studied. So, you have a SCEA that uh does not study
26 alternatives. Uh, and when the previous EIR was studied, none of those were acceptable, um,
27 and that was 64 units, this is 84, um, you cannot consider any aesthetic impacts such as, uh,
28 shading and, uh, light spillage and things like that. Because uh SCEA doesn't allow it, um,
SCEA allows few if any traffic uh impacts to be considered uh actionable. Um, we know that
the 64 unit was going to increase uh the roadway trips significantly. Um, you know, why are we
going backwards on this if 2017 was a new project that essentially was a rebadged uh up up up
uh zoned uh version of the 64 unit project. Um, you know this the design commission, SCEA,
also says that it's similar to an environmental uh an initial study with the mitigated neckler,
negative declaration, yet 2013 the design commission rejected the initial study on the 64 unit
project requiring the full EIR study. So uh the point of all this is is that we have all these
deceptions in SCEA, the height averaging says the average height 64 feet, well doesn't take a
rocket scientist to see on Fair Oaks, uh, the average height on Fair Oaks is 81 feet.

1 Kevin Johnson: Thank you, your time has concluded, if you could please finish up your
2 comments, thank you.

3 Mike Salazar: Well, the the point here is that there's just too much uh confusion unknown in the
4 SCEA process. Uh, I would hope that the commission would recommend to the City Council to
5 discontinue that and return uh to the full EIR process, uh look at alternatives, uh look at uh
6 preservation impacts that I think are woefully under reported in this. Thank you.

7 Kevin Johnson: Thank you. Our next speaker is John Cambianica. John, can you hear us? Go
8 ahead and -

9 John Cambianica: I can hear you fine, thank you. John Cambianica, architect representing Castle
10 Green. And I I wanted to bring to this board's attention that in the application for the Central
11 Park housing project, they made reference to a previous hotel green rendering that showed an
12 extension or wing uh being generated uh parallel to Fair Oaks Avenue. And this application um
13 seems to be implying that they're they're making this expansion in the spirit of the old hotel.
14 However, when you look at the proposed massing of this project, the bay depth of what they're
15 proposing is roughly twice of what the original uh hotel green expansion uh had at that time. So
16 with that said, the internal courtyard as projected in the GNK renderings is not as spacious as
17 you might think. Um, it it kind of artistically uh removes the property line fencing between the
18 two properties and makes it look like uh the Castle Green uh rear yard is a part of this courtyard
19 that they have. And it's, it's somewhat deceiving. Uh. Additionally, if you look at 3D Massey
20 models of the GNK project, it blocks sightlines to the Castle Green, and puts the Castle Green in
21 shading a lot of times during the um the summer and winter months when the sun turns, uh
22 comes around to the western part of the building, that's very accurately uh depicted with uh the
23 3D software where you can plug in uh months of the year, times a day and it shows those
24 shading patterns as they project on to the west face of Castle Green, which puts that golden in
25 shade. So you know, Castle Green is a national historic monument. And uh it is impacted by this
26 project by the way of its its lost sightlines along Fair Oaks Avenue. And being put in shade I uh
27 I would respectfully request this commission look at reducing the massing of this project
28 substantially from what is proposed. That's all I have to say. Thank you. If you have any
questions, I'm happy to.

22 Kevin Johnson: Thank you.

23 Srinivas Rao: Are there any others, Kevin?
24

25 Kevin Johnson: Uh, yes, we do have a couple others who have raised their hand, so uh two more
26 David Woodbury. David, you can unmute yourself and and address the Commission.

27 David Woodbury: Thank you Commission. My name is David Woodbury. I'm a sixth d-district
28 resident. And I just feel like we're allowing through the SCEA process, one of our greatest
architectural treasures to be unrestricted in blocking site views that have existed for 134 years on

1 a nationally registered historic block of Pasadena. Castle Green is the icon for a century of
2 Pasadena in postcards, artists, renditions, and so forth. And here we are allowing this
3 development under something in the guise of Metro proximity, which will be a high end
4 development to negatively impact the charm of one of our greatest icons. And to me this is just
5 appalling. First of all, and and furthermore, GNK, the owners of the hotel green, not the Castle
6 Green, have shown a half century of neglect to this nationally restored, uh this project. If you go
7 on the facade right now, it's been crumbling for years. They have remediated this with netting
8 and not repair. They're now talking about didding, digging a four story underground parking
9 structure, seven story's above ground within 100 feet of a building that structurally, there are
10 floors on the fifth floor that slope south, so much so that you can roll a golf ball and they roll the
11 whole length, and yet we're supposed to believe that structurally, this is seismically not in
12 jeopardy, and we're going to build this huge monstrosity. Furthermore, the traffic on Dayton, if
13 you go on Dayton, two cars approaching each other have to give way, one to the other. If a truck
14 and a car comes together on Dayton, one has to back up. There's a Z shaped traffic light on the
15 corner of Dayton and Fair Oaks that is already a traffic menace right next to Schoolhouse Park, I
16 mean the ladder 31 and with a main artery to the 210 freeway, and we're adding a four level
17 underground parking garage, 50 feet from that corner. So I just think there's so many problems
18 with being bulldozed through SCEA and this environmental thing that handicap and handcuff
19 the design commission's ability to make this a respectable addition to Pasadena and not just
20 shroud out one of our greatest historical treasures. So that's all I had to say. Thank you.

21 Kevin Johnson: Thank you.

22 Srinivas Rao: Do we have one more?

23 Kevin Johnson: Uh, yes, we do. Sharron Moore. You can mute, unmute yourself.

24 Sharron Moore: Yes, I un-muted myself. Can you hear me loud and clear?

25 Kevin Johnson: Yes, we can hear you. Thank you. Please go ahead.

26 Sharron Moore. OK, great. So my name is Sharron Moore. And I live in the Castle Green. I live,
27 I grew up in Pasadena in a house above the Rose Bowl. And I moved into the Castle green, um,
28 about five years ago. I live on the sixth floor. And I'm going to go back and start with number
one. Uh. There is not a housing shortage in Pasadena at all. And I'm an African-American
woman. I'm the only black resident of the Castle Green. And I will be probably only the first
black owner of the Castle Green. To have my entire home encompassed by a giant monstrosity
is absolutely asinine on that corner. Completely asinine. For the city that I grew up in to approve
this and look at it and consider it is absolutely asinine. It's a joke. Dayton Street has an
enormous amount of of traffic. I'm going to agree with my neighbor, David Woodbury, you can't
have two cars go back and forth. You have strollers that are almost being hit with parents. So
how are you going to dig in the ground and pull up put put this monstrosity on the corner. The
cast, the hotel green is enshrouded in cracks. If you did, it wouldn't surprise me if that whole

1 half of that structure falls down on the ground. So for you to own that building, and then want to
2 put a new one in, but you haven't even fixed that one yet. And David is absolutely right. It's
3 crumbling, there's cracks everywhere. It's dilapidated. It's an eyesore. They have netting that's
4 been sitting there for probably over a year. They had scaffolding that set up for three years that
5 the city forced them to take down. Yes. And I think I met Emily, I just find the arrogance of this
6 company to come in and enshroud a national historical monument in my city, my city, my city
7 that I volunteered in the junior chamber of commerce, my cousin who actually sat on the council
8 board, Printis Diedrich [ph]. I find it really arrogant of that. And I find it arrogant of the city to
9 come in and allow to even consider drawings like this, architectural companies to come in and
10 even put this on that corner, accept something of that monstrosity of a size. If it was three
11 story's, they may be able to do that some, or make it a little bit more presentable. But as they
12 told me when they came to the Castle Green, it was OK to block my view so that somebody else
13 could have a better view. That's exactly what their rep told me, face to face. And I go well, that's
14 a great arrogant [CROSSTALK].

15 Kevin Johnson: Please finish up your comments.

16 Sharron Moore: My comment is that that would be an absolutely disgusting thing to have sitting
17 on the corner. I have friends that come over from all around the world to look at the council
18 green, well, why would you enshroud it with that piece of garbage and cause the environmental
19 impact that it would on the streets surrounding it. And nobody's shopping at the retail stores by
20 the way that they put up in the Parsons Project, those things are all empty. So, so much for retail,
21 nobody's shopping over there. And there's empty retail right across the street. Thank you.

22 Kevin Johnson: Thank you. Um, Chair, we have uh two more hands uh raised.

23 Srinivas Rao: OK.

24 Kevin Johnson: First is Jack, you can unmute yourself Jack.

25 Jack: Thanks, Kevin. Uh, I just have two uh two quick uh um points to make that um uh Susan
26 Brown Holly uh was going to um speak um uh on this um issue. And she was called away uh by
27 a family emergency just a few moments ago. And um the couple of points that um she would
28 want uh to make, uh I don't pretend to stand in for her uh expertise. But um uh a couple things
that that uh were in the SCA uh um documents um that uh I believe that a body uh such as
yours, um a review body can uh refer back to past EIRs. Uh, and so I understand what Kevin is
presenting that uh this is a brand new project. However, it's got the same uh footprint, the same
address, uh, and this is actually the fourth time, I believe, over the years that uh they're, you
know, this um same uh position has been used that it's a new project. Uh, and so this is not the
first time that this has happened. Um, and then also um that uh I don't remember the SCA being
mentioned in 2018, in terms of this, uh, that particular hearing, dealing directly with uh SCEA.
Um, and so anyway, uh just that um I-I just wanted, um, I-I just wanted the uh design
commission to um uh know that that uh that that's possible that that there is document, that there

1 is, you know, I mean, uh that the design commission can refer back to uh past EIRs, at least
2 that's my understanding of the SCEA documents. Thank you.

3 Kevin Johnson: Thank you.

4 Srinivas Rao: Thank you.

5 Kevin Johnson: Uh, last speaker um at this moment is uh Margaret Morgan. Margaret, you can
6 go ahead and unmute yourself.

7 Margaret Morgan: Can you hear me?

8 Kevin Johnson: Yes, please go ahead.

9
10 Margaret Morgan: Uh, I would just like to echo the comments of John Cambianica and Mike
11 Salazar, um requesting that this commission do a full EIR rather than just use the SCEA process
12 because of the impact on the traffic and also the impact on the Castle Green. I also live on the
13 Castle Green on the west side, on the fifth floor. And John Cambianica's massing study has
14 shown that our building is going to be in shadow for a large portion of the afternoon, um both in
15 summer and winter. And the full impact of the traffic um has not really been studied in the
16 SCEA process, I don't believe. So I'm, I urge the commission to adopt a full EIR on this project.
17 Thank you very much.

18 Kevin Johnson: Thank you.

19 Srinivas Rao: Thank you. Was that the last one, uh Kevin?

20 Kevin Johnson: That's correct. There are no more hands raised.

21 Srinivas Rao: OK. Thank you, uh, for the comments, everyone. Um. Can we have uh um Emily
22 to respond to them?

23 Kevin Johnson: Yes. Emily.

24 Emily Taylor: Sure. I'm I'm happy to do so. Um. any particular um uh question you'd like me to
25 respond to first?

26 Srinivas Rao: Not necessarily. Please, you you heard all the comments, and uh there were some
27 commonalities, um respond as you deem fit.

28 Emily Taylor: Sure. Um. So first, uh Commissioner Sales had had a-asked for clarification about
our parking um, so I'll address address that first. We'd originally considered 195 spaces here.
Um, and and because of the sense of public outreach that we've done, uh that feedback did come
back, is there a way you can reduce parking, um, and our belief in transit-oriented housing. So

1 we've asked for a reduction to 195 spaces or excuse me, 159 spaces here, um, that keeps us at a
2 one to one ratio for our units because we do have um the restriction for any on street parking.
3 Uh, we do have to replace the 53 parking spaces that are there today for the Green Hotel so that
4 number is maybe higher than you would expect but as it deals specifically with our project, it
5 keeps us to as a one to one ratio for our residential units.

6 Srinivas Rao: So, uh, just quickly, so does that mean it has 159 plus 53 parking spaces?

7 Emily Taylor: The 159 is inclusive of the 53. That's all total.

8 Srinivas Rao: OK. One to one. OK. Thank you. Please, c-continue.

9 Emily Taylor: Um, as for uh some of the questions that are related t-to design, we're happy to
10 address those when we come back to design commission's. Um, ARG, who is our architect, and
11 uh not only architect um but also a historic preservation firm um they have provided uh will
12 provide you with documentation for uh distance studies that show how wide our courtyard really
13 is, as well as uh shadow studies that we've also completed um but we're happy to address those
14 when we come back to design commission. Um, and to uh the particular comment, um uh of
15 having our team meet me that is because of all of the the public outreach that we've done, we've
16 done several meetings uh with the public to try to address their concerns and provide as much
17 information as possible. Um, and finally, I'd like to address some of the questions about Green
18 Hotel specific. Specifically, um we we ha-did in in put input um netting on that project to secure
19 the stucco when we had some visual, um uh we saw that there were some visual problems with
20 the stucco. Um, I have since been working with um a uh general contractor that specializes in
21 historic um preservation and did the Dunbar Hotel that's in South Los Angeles, a restoration of
22 that project. Um. We are going through the entire building. And we've done an envelope study
23 with ARG as well as with um uh an engineer to assess what is needed for the structure of the
24 building and the stucco, to make it historically um appropriate, uh as well as addressing some of
25 the other things in our building. And so right now we're in a in a complete rehabilitation um
26 planning process. We plan to start that as soon as possible to address all the needs of the
27 building.

28 Yolanda Sepulveda: [CROSSTALK] ask questions.

Srinivas Rao: Yes, please.

Yolanda Sepulveda: Why wasn't that done before, just out of curiosity?

Emily Taylor: Sure. So uh that's a-a-a good question. Um, the the the cracks in in the stucco
were first ob-observed in, I believe, February of 2020. Uh, scaffolding was put up in March
2020, if you recall, right before the the lockdown. Um, and so it was up much longer than than
Goldrich Kest would have liked, um, certainly some of the the pandemic and the lockdown uh
slowed us in our efforts to address and um and look at all of the needs of the building. Those

1 reports have since been completed. And so certainly we can point to that. Um. Also, I'm rather
2 new to the project team and uh and I'm a member of the Pasadena Community, I live in South
Pasadena. Um, this is something that I care very much about and want Goldrich Kest -

3 Kevin Johnson: Emily, Can you still hear us?
4

5 Emily Taylor: I can still hear you. I heard I heard somebody else come up and I'm I'm not sure if
you could still hear me.
6

7 Kevin Johnson: No, go ahead. We can hear you now.

8 Emily Taylor: So uh and Goldrich Kest, so we want to make sure that we're doing right by the
9 building, doing right by the the community of Pasadena um and to return a building to the
community and our residents that is fully rehabbed with, that won't have any additional
10 problems.

11 Srinivas Rao: OK. Thank you. Any other questions? Yes. Commissioner Lipira.

12 Stephen Lipira: The project that you mentioned, you put the scaffolds up in February of 2020,
13 do you have a deadline when you will be completing this?

14 Emily Taylor: Right [INAUDIBLE] we, our goal is to to start that um as soon as we uh we're
15 we're seeking historic tax credits to help fund that so once those are secured, then we will go
forward with that project.
16

17 Stephen Lipira: Thank you.

18 Timothy Sales: [INAUDIBLE] I had a follow up.
19

20 Srinivas Rao: Yes, Commissioner Sales, go ahead.

21 Timothy Sales: Uh, so uh, so thank you to the applicant for clarifying the parking. So I
22 understand this looking at more than multiple documents so it's 84 apartment units and then are
there, are there there are also some live work units, are those in addition to the 84 apartments?
23

24 Emily Taylor: That's correct. There are 84 uh strictly apartment units, and then the quasi live
work units that are four additional um commercial [CROSSTALK] space.

25 Timothy Sales: OK. So that's 88. And then, so 159 minus 80 and then is there - So is that the
26 difference, eight - So do you have to provide 71 parking spaces to make up for what you're
taking away? What's the number that you have to net for the replacement parking?
27
28

1 Emily Taylor: So the wa- the way we came up with the um 159 was taking a one to one ratio for
2 the 84 units. Um, but we maintain the 53 and then reducing um this uh transit priority projects
3 allow for a 50% reduction so we've reduced f- our parking 50% on the commercial units, excuse
me on the live work units, our commercial space, as well as our guest parking.

4 Timothy Sales: OK, gotcha. OK. Thank you for that clarification.

5 Srinivas Rao: OK, any other questions? Yes. Commissioner Carpenter. You have a question.

6 Robert Carpenter: Uh, yes, Emily, thank you. Um. Can you describe to us the difference in the
7 review process, uh specifically dealing with traffic uh between an EIR and SCEA that we're uh
8 currently looking at?

9 Emily Taylor: I'm happy to do so but I prefer uh there was uh a change in the methodology at
10 the state level, um, that certainly our, Kevin's team would be better suited to address.

11 Robert Carpenter: OK.

12 Theresa Fuentes: A-a-and and if I could just quickly jump in. Um. Emily is very well respected.
13 But I-I honestly wonder if that question would be more directed at city staff.

14 Robert Carpenter: Fine.

15 Kevin Johnson: So so in terms of the analysis between SCEA and an EIR, there is no difference
16 um in the traffic analysis, it's it's exactly the same analysis that would be conducted either way,
17 if it was a an exemption or uh a mitigated negative declaration, SCEA, EIR the traffic thresholds
and methodology is the same across the board.

18 Theresa Fuentes: And and if I could if I could add just a little flavor to what um uh Kevin was
19 saying and Mr. Bellis who's on here with us can also jump in too but I'd really like to point out
20 to this body is that we are no longer allowed by law to consider um level of service as a
21 threshold so the city has adopted what is currently allowed by law, the VMT and VT analysis.
22 And so and what's a little bit at issue here is that the prior EIR was done under the prior legal
23 framework, the legal framework has totally shifted on us. And that's frankly, one of the biggest
reasons why the the prior EIR is no longer relevant. It is outdated, pursuant to the law so I'll stop
there if you have further questions.

24 Robert Carpenter: Uh, I don't I I just wonder to stand the difference and uh you told me the
25 difference. Thank you.

26 Srinivas Rao: OK. Thank you.

27 Timothy Sales: Chair, can I just -
28

1 Srinivas Rao: Yes, Commissioner Sales, go ahead.

2 Timothy Sales: Yeah, I just and I think this is a very important point and and uh on task we've
3 been ta- going a lot with this. But if you staff member Viana on the call he could talk you
4 through this, but this this this project because of its central location and its access to
5 transportation and so on, in the model, it performs excemely, extremely well, and provides no
6 significant impact on traffic, which kind of sometimes falls in the flies in the face of what
7 people's expec-experiences are along these little streets and so on. But that that that is as as Miss
8 Fuentes mentioned, that is the reality of CEQA that we're under now. Um. I do have a question
9 about the about the transportation analysis so when we get to that if we share when we can
10 maybe engage more on that.

11 Srinivas Rao: Certainly. Um. A-Any other questions for Emily from the Commissioners? None.
12 OK. Thank you so much, E-Emily, for a-answering our questions. Um, I'd like to close the
13 public hearing now and open it for Commissioner discussion.

14 Timothy Sales: Can I just jump back in with that question real quick?

15 Srinivas Rao: Yes, please.

16 Timothy Sales: So and I-I see uh, Commissioner Delgado, I'll be quick. You had your hair, hand
17 raised. I-I just want to ask uh staff member Viana about this, you know, it it it does perform well
18 on the the new VMT model. But there definitely are, they they appear to be some real sort of
19 like street size street width limitations there. Have there been discussions, you know, this is not
20 popular, but there have been discussions about maybe taking away some of the street parking to
21 provide uh more uh access to major pinch points, like this project is now going to be taking all
22 of it. Well, it's going to maintain its access at roughly the current location of where it has access
23 to the surface parking lot but there's more trips. I'm wondering, did that come up in the
24 conversation and um would that be something that the OT would have an opinion about?

25 Conrad Viana: Uh, removing the street parking, uh the pro-, we have a process, and one of the
26 um points of that process is to communicate with the adjacent property owner. So if Castle
27 Green, and also the the parking lot um owners are in agreement um with removing that um we
28 we could do so um but it's really uh um the pr- there there is a process and we have to come into
29 compliance with uh the neighboring property owners.

30 Timothy Sales: Uh, and as a follow up conversation about this, I mean, I guess, I guess that the
31 fact that it's already performing below threshold on the DMT is a good thing from a CEQA point
32 of view, would there be any further analysis that you could do to make the project, you know,
33 would it be would it be would it be important for DOT to to reevaluate the project based on a
34 lower number of parking spaces as the applicant suggested they're willing to go to?

1 Conrad Viana: One that you have to realize when we're evaluating the project from a CEQA
2 transportation perspective is uh the underlying theme for traffic, in terms of CEQA is related to
3 accessibility and yes, it's relate- yes, there is traffic, yes, there are cars. Um. However, the fact
4 that it is close to um the transit facility, the Metro Gold Line, as well as um other um transit
5 lines on Fair Oaks and Dayton, um having a lower parking um requirement does not necessarily
6 affect the VMT um number.

7 Timothy Sales: That makes sense. OK. Those are my questions on transportation, I-I have some
8 other things that I'll I'll sweep the floor for now. Thank you.

9 Srinivas Rao: Thank you, Commissioner Delgado, you had -

10 Julianna Delgado: Sure. Um. I have a couple of co- this is the the right time for comments. I
11 have a few comments here. So um my understanding is that SB 375 was one of those uh a
12 landmark piece of California legislation that has to do with transportation planning. And this
13 project is basically, um, the reason we're doing a SCEA is because it's an outcome of that kind
14 of thinking where every region in California has to [INAUDIBLE] transportation plan, and then
15 a Sustainable Community Strategy to bring people closer to mass transit, which is why projects
16 like this have gotten sort of priority or streamlining kind of processes. But in terms of
17 environmental review, the only real change for a project like this is that you don't have to look at
18 all of the cumulative impacts, or the growth inducing impacts, because this has already been
19 done through SCAG, through our regional transp, our regional planning agency and looking at
20 its strategy, and through this EIR and then the EIR also for the central district specific plans. So
21 when it says a SCEA just reduces redundancy, that's really all it does, because they have to go
22 through all of the review, um, for all of the items, the 20 or so possible impacts. The other thing
23 I wanted to say is that we had talked about, someone brought up earlier about setting, setting and
24 um I think the city attorney said this well, um in an environmental review is far different than
25 when we talk about context and something being context sensitive in a design from a design
26 standpoint. Setting is one of the criteria that determines integrity with respect to historic
27 resources so um in in this case, this is the only area where a new building would affect integrity
28 because we're talking about a property where there is no building, there's an area that has
nothing on it, and you're going to put something on it. And that's the only aspect that's gonna
really change here. Um. In terms of history, um the sort of the elephant in the room here is that
the the Castle Green was [AUDIO SKIPS] feet from the hotel green, which burned down at
some point, that was on the, on the east side of Raymond and there are little pieces left of it. So
all the postcards that I have of the Castle Green show that bridge that goes across Raymond to
the to its uh to the other property that's no longer there. Um. I, I can sympathize with people
who are living in uh the higher, in some of the higher floors on the east side of of the Castle
Green, I have I have some dear friends that actually live there and they will be in shade. But uh
originally, the building was designed by phase five would have put a building there if they had
had the funding to do it uh earlier in the in the, you know, 1905, or whenever they they decided
to to, you know, go ahead with wh-when they wanted to go ahead with um phase five, but they
didn't have the funding to do it. So it was always designed to be like that. Um. I don't know, it's

1 difficult because in Pasadena, we don't protect private views and the idea, um there are cities
2 that do have view corridors where views are protected, but they're not in Pasadena. It's, it's if
3 you want to have the view, then you need to buy the property next door, so nothing is ever built
4 there. But um what's interesting about this project it means it meets all the entitlements, that's
5 why it's not going in the planning permission. Um, so it's a little bit complicated but I do agree
6 with the, I found the um the SCEA to be very well done, very well documented, I I completely
7 agree with staff's recommendation. And that's sort of where I I stand on that. Um, and it's just
8 from an environmental standpoint, we're not looking at it the design of the building, which we'll
9 come back to [INAUDIBLE] later on, and we can decide whether it really fits into the context.
10 Um, so that's just, those are some of the content, the comments I wanted to make. But I did read
11 through every word of this document and all of the appendices, um I saw that the idea of setting
12 was corroborated by Teresa Grimes who's one of the pre-eminent um architectural historians.
13 Um, and in her letter, she said the same thing that the only impact to that hotel or the only effect
14 on the hotel is setting meaning that you're putting a building on so-, where there there is nothing
15 now and that's that's it, period. Um, so I appreciated that, I appreciated her for um providing that
16 documentation as well. And um that's all I have to say right now, which is kind of a lot, but I I
17 do appreciate this and I support the SCEA and staff's recommendation.

18 Srinivas Rao: Thank you, Commissioner Delgado that was very well summarized. I sort of
19 concur with a lot of things you said. Commissioner Toro, you had something to say.

20 Jose Noel Toro: Yeah, I'm wondering if it's possible for you to request -

21 Srinivas Rao: I cannot hear you properly.

22 Jose Noel Toro: Can you hear me better now?

23 Srinivas Rao: Yes.

24 Jose Noel Toro: OK. Thank you. Sorry. Technology challenges there. Um, I was gonna say that
25 is it possible for the applicant to present an analysis of the unit that uh of the impact to the
26 specific units on the existing building that um in during concept, so we could understand a little
27 bit better, in more detail those units that are more specifically affected um with the new layout?
28 That's a question.

Srinivas Rao: I guess that's for Kevin, that, I guess uh, Kevin, you want to respond to that. I'm I
suppose that the applicant can listen in on this and make a note.

Kevin Johnson: Are are you talking about views or shadows or or what what what are you?

Jose Noel Toro: Yeah, I would like to see a plan uh more specifically where those units are if if
uh and existing versus the new. Um, I also I already the the applicant already mentioned about
uh they will be bringing a an analysis of the shade, uh shading impacts on the building. Uh, I did

1 see the the model and the shading, it it seemed like it was during a very late time of day, during
2 a certain time of year so I would like to know really, how, how is the shading impacting
3 throughout the year and what's the average impact on on the existing building. So it-it-it's from a
4 three dimensional and also from a floorplan perspective of the existing units and the the new
5 development.

6 Theresa Fuentes: So, uh Kevin, if I may jump in just for a quick second. And I'm just going to
7 jump in on on the SCEA point only, not on your design uh review um authority. But just on
8 SCEA point only from an environmental standpoint um CEQA is more concerned about
9 environmental impacts on the uh public, as opposed to individuals so when it comes to one or
10 two, or five or eight people who are experiencing a potential uh effect um CEQA is not
11 concerned about that. It's more about the environmental effect on the public um so your question
12 may be very relevant to your design review but in in terms of environmental review, since it's
13 not an effect on the general public um uh CEQA would be less concerned with that.

14 Kevin Johnson: And I just, to jump in from a design review perspective, um view, the
15 commission could, you know, request that during design review the applicants provide some
16 more information to show how they're proposed building massing affects views and shadows
17 and other things related to the adjacent building.

18 Jose Noel Toro: Yeah.

19 Kevin Johnson: To help inform your your analysis of whether, you know, the massing should be
20 modified or, you know, the project design modified in some way um to address those issues. Uh,
21 but from an environmental perspective, as as Theresa indicated, that would be something that
22 would be uh for consideration.

23 Jose Noel Toro: Understood, thank you for the clarification. And I guess my question was for
24 the concept design review, and that was my uh question for those things to be included uh
25 during - Because right now, it's something of concern.

26 Julianna Delgado: Could I jump in here too, and just add one more really quick comment?

27 Srinivas Rao: Sure. Go ahead.

28 Julianna Delgado: I I forgot to mention that um Pasadena heritage, uh, I read with interest their
letter and is that something that we can add into the mitigations to consider um parking
restrictions at the intersection and having a raised crosswalk? Could that be considered in the
conditions of approval? Or would that be further along design review? Or could it be in the
mitigations?

Theresa Fuentes: So Kevin, I'll jump in again, real quick. Uh, so when it comes to the
environmental effects we can only mitigate what is a potentially significant environmental effect
and that has not shown to be a potentially significant environmental effect in the CEQA context.

1 Julianna Delgado: OK. Thank you.

2
3 Srinivas Rao: Thank you. Commissioner Hawthorne, you had a question?

4 Christopher Hawthorne: Yes. Just a a comment. Thank you Chair Rao. Um, I am fully
5 persuaded that the project meets the requirements for SCEA streamlining, um and I agree with
6 staff recommendation and some of the comments from Commissioner Delgado, I think the um
7 questions and comments from the public um about impact on view, shading etc, are um
8 appropriate for us to take up at concept design review stage, as are many of the other issues that
9 we have been discussing this evening. So my recommendation, if others are in agreement, is that
10 we move toward that phase um and agree with staff that this uh has met the threshold, um is
11 very clearly spelled out in the uh in the material share with us for um for this kind of SCEA
12 streamline, it seems like a a project that's very much in line with um the requirements and
13 expectations of SB 30 uh 375. Thank you.

14 Julianna Delgado: Are we are we making a recommendation or do we do a straw vote or
15 something because we're not met, we're making a recommendation, but we're not taking any
16 kind of action?

17 Kevin Johnson: I would say that uh it would be appropriate for the commission to uh make a,
18 you know, to have a vote on the recommendation to provide to counsel.

19 Srinivas Rao: OK, so uh would somebody like to make a motion - Commissioner Carpenter, you
20 had something -

21 Robert Carpenter: Uh. No motion. Just another question of staff. Uh, when this gets to Concept
22 Design Review, is there height averaging in this property?

23 Kevin Johnson: Yes.

24 Robert Carpenter: OK, that was my question.

25 Srinivas Rao: Thank you. So anyone can - Yes, Commissioner Sepulveda.

26 Yolanda Sepulveda: This is a question for staff so and it's a clarification before a comment, I
27 guess is the purpose - Can you explain to me the benefit of um the TPP and the benefit of, of
28 SCEA given this project to to the city and this particular site. I guess what I'm asking is is that
knowing that the transportation component is key, what is zoom benefits of of that for us?

Kevin Johnson: [INAUDIBLE] to the city um it it meets all the the criteria for for the city -

1 Yolanda Sepulveda: No, what's the goals, yeah the goal of it as it relates to um transportation,
2 and -

3 Kevin Johnson: It's it's to provide um, you know, direct development in areas where there is
4 adequate transit and um adequate facilities for public transportation and and to focus
5 development in those areas. I think, John, did you want to uh weigh in on that, John Bellas.

6 John Bellas: Yeah, thank you, Kevin. Um, Good evening Chair and Commissioners. John
7 Bellas, I'm the city's environmental coordinator. And I I, if I can answer your question maybe
8 from two standpoints. One is the state standpoint in adopting uh and passing SB 375. And that is
9 to um encourage density and residential uses and other trip generating uses near transit. And to
10 stream streamline and provide certainty Commissioner Sales used a good word earlier, provides
11 certainty for those projects that are near transit, um, through the CEQA process, so the benefit at
12 that level is to encourage these types of projects. And the benefit at the local level is not only to
13 provide certainty through the CEQA process uh for the applicant, but also defensibility on the
14 city side, as well as to um, the other component of a SCEA is that the prior applicable EIRs all
15 feasible mitigation measures from those prior applicable EIRs need to be implemented on the
16 project. And so that uh a really detailed analysis of three prior EIRs, the uh the SCAG,
17 Sustainable Community Strategy, EIR, RPPS, EIR, the city's general plan EIR, as well as the
18 central district specific plan EIR. All the mitigation measures from those EIRs were analyzed,
19 and all the feasible mitigation measures from those EIRs um were applied to this project. So
20 that's a level of analysis and detail that you wouldn't get through other CEQA provisions. And
21 so it's a uh it's a benefit to the city in this case.

22 Yolanda Sepulveda: Is the assumption then that given TOD and transportation, that, again,
23 lowering parking and things of that sort because of the exclusion for vehicle miles traveled and
24 and the things we don't have to necessarily take into consideration because, again, we're we're
25 close to transit, we're we're providing that certainty is that we would have increased pedestrian
26 traffic?

27 Michael Bellas: Um, you know, I I don't know that the consideration is that fine grained. It's
28 more holistic in its view of if you put the right type of uses near transit opportunities, then there
29 will be synergy there in terms of aligning land use and transportation planning.

30 Yolanda Sepulveda: OK, um, is, we're reducing parking on this for this project. Um. We talked
31 about the one to one versus other other standards. Um, and I'm assuming that is because - Is it
32 safe to assume that that's because we assume these people will be use utilizing public
33 transportation?

34 Michael Bellas: That would be my assumption, I haven't been involved in the parking
35 discussions and the parking demands that analysis for this project so I'm not sure if Kevin or
36 Conrad have more information on that.

1 Kevin Johnson: I mean, the, the intent of allowing for those parking reductions in TOD areas is
2 to encourage transit. Um.

3 Yolanda Sepulveda: OK. That's what I'm trying to get at is the increased pedestrian because I do
4 have a question related to that. So this is something this goes up for discussion to um my fellow
5 Commissioners, which is, sure the SCEA looks great on paper and seems to pass muster in
6 terms of checking the boxes and things of that sort, I think as you read through it that's its intent
7 is to basically say things were acknowledged, considered and any reasonable thing, but it
8 doesn't, that's not absolute and doesn't mean that there's not a risk. So, um for example, even
9 things like um the cause to adverse change and significance in historical res-resources, is that it's
10 not a significant um adverse change, but there is an adverse change. So views of Hotel Green,
11 things of that sort. I know one of the the reasons that it said it was acceptable is because the trees
12 already blocked the view from the park, things of that sort. Um, so again, it's not saying that
13 there isn't, which to me is I'm I'm finding some trouble in ignoring those considerations, in
14 addition, from a TOD and pedestrian standpoint, if the idea is that, again, we're encouraging
15 people's access to the public transportation that is fantastic in this area. Dayton, the level the,
16 again, on Dayton, the challenges with the street, the challenges with vehicular access, public
17 safety, there's a park, there's a, you know, entire pedestrian oriented community in the area, I am
18 struggling a little bit with safety, life safety of individuals and pedestrians, you've had a couple
19 people um tragically hit in pedestrian areas where view borders and things like weren't
20 necessarily um as safe as could be. Um, I think that as traffic increases with retail and and some
21 of the programming in the building, I am struggling trying to understand that that's something
22 we don't need to consider. But I would like to hear from my fellow Commissioners.

16 Timothy Sales: Chair, may I -

17 Srinivas Rao: Yes.

18 Timothy Sales: May I can -

19 Srinivas Rao: Please.

20 Timothy Sales: Uh, I think that that uh Commissioner Sepulveda comments uh sort of were in
21 line with where I want to make a comment. So my first things were questions and now. So I do
22 agree with fellow Commissioners that uh, that the environmental analysis is satisfactory from
23 the point of view of checking the boxes to echo Commissioners Sepulveda's um phrase. I mean,
24 CEQA is a risk management tool for cities and developers and for communities. And it's, it's far
25 from perfect. Um, I think that one of my concerns about the process and and and the and the sort
26 of the elevated uh or heightened uh importance because the the we don't usually review these
27 things and the City Council asks us to look at this is that some of these things are, are both
28 quantitative and qualitative. I mean, I think that the transportation planning issues that um
Commissioner Sepulveda raised are very valid and I think that those are things that
unfortunately, um you know, there's, as the city attorney indicated, there's not a significant

1 impact as the state wishes us to, to determine it anymore. Um. However, there is still some
2 leeway with uh out of CEQA analysis, which comes later and DOT can can look at and and and
3 clearly there's huge um uh leeway that cities have in conditioning projects for things at an
4 approval stage, uh we're outside of SCEA. So I think that, in my opinion, uh you know, this
5 we've been asked to look at one component of what is usually a multi-pronged, uh you know, uh
6 approval process, which the CEQA documents need to be certified, we've been asked to look at
7 those. In addition, there are conditions of approval that ci-cities will routinely uh adopt. And so I
8 think if there's any confusion about these things, one reasonable recommendation back to city
9 council to just say, we recommend the following conditions of approval um on these issues. Um,
10 and those can be uh informed by community feedback, as well as I think and more importantly
11 to my point of view, preserving our rights in this dialogue, in the record, to return to these issues
12 later in design, because as we've already seen, it was October of 2017 when the preliminary
13 consultation was done. It'll probably be five years before we see concept de-, you know,
14 development, uh Concept Design Review, and it doesn't serve the city to have these things
15 dragged out so long and have lack of institutional knowledge. So I would support us to, to look
16 at that and I'm sure the city attorney can opine away on that. But I'm not sure what the city
17 council ultimately is going to be adopting. There's a resolution that's in in the documentation.
18 But, um you know, I guess, uh you know, we do have conditions of approval at design review,
19 and maybe it has to wait until that point, um and DOT and other departments have a lot of
20 leeway in the conditions of approval, they they uh ascribe to projects that have no other zoning
21 entitlement required so I think we do have the room there. The last thing I'll say, and and it was
22 really kind of the primary thing I want to say, so sorry for that long segway but I think it's
23 important is that, you know, I, there's a lot of outrage in the community about loss of views of
24 built, of a historic building. And I definitely agree that the esteemed architectural historians and
25 consultants who work on this are really best of breed. But if you read the historic resources
26 report from HRG, you know, it's interesting because uh they say only setting will be impaired,
27 um, but they also say on page 23, because they try to kind of use language to say, oh, it doesn't
28 really matter. There's trees there, oh, it doesn't matter. The primary views of the building were
from these streets. But in the report, they say that the park became the front yard of the hotel in
1898. And it's still evident today in front of the Castle Green. Right? So they're saying in their
report, that the relationship between the park and the project site is important. And they're
suggesting that, in fact, it is a primary view. And I think that my disappointment is that I think
the project, you know, maybe you can't really have it be excellent from Fair Oaks coming up at
an angle, but I think it's not very good from the point of view of its relationship to the park. Um,
and these are issues that Commissioner Sepulveda started to get at. So, you know, uh I think
that, that one of I think seven things that Commissioner Delgado referred to, as being the test
for, uh you know, impairment. I mean, the setting is only one of seven, but they're saying it's
important, um, so that's a that's a consideration. I don't know, if we're gonna make a
recommendation that it's something to be reconsidered and evaluated in CEQA document, but
it's certainly something that is in our purview on design review. And then lastly, on the historical
uh documents, I think it's kind of ironic, because, you know, we're also saying the other thing
about it does it impact, does it meet the Secretary of Interior standards? And it doesn't, you
know, we we don't have any impact on that because we're not touching the building. But another

1 component of Secretary of Interior standards is the appropriateness of new developments. And
2 in fact, this architectural resources group has gone a long way to make this look just like, uh you
3 know, that 1903 thing, although it's fatter, one of the, one of the commentators said, oh, the bay
4 depth is significantly different, it is, but I don't think that actually the Secretary of Interior
5 design standards would really encourage you to look the same. But that's a big issue, because in
6 the city of Pasadena, we like things to look like they're old. But to me, I think that the project
7 could also fail on historic, you know, cultural resources or rebates on that, it's not really, I don't
8 know, is that really meeting the Secretary of of of Interior design guidelines and make a project
9 look like it's a a building from 1903. So I think that, you know, it's unfortunate that um those
10 things were kind of just sort of set aside. And the the only mitigations, really significant
11 mitigation, is the one for [INAUDIBLE], the other two are performing mitigations that every
12 project has on cultural and uh anthropological resources and Native American resources. And
13 they're kind of just uh window dressing. So I mean, I think in summary, I I I wish we would
14 make some conditions and approval for things that we think are important. And two, I would be
15 curious to know, the other Commissioners have feelings about uh sufficiency of the historic
16 resources, uh components on those two factors of, of uh setting relative to this front door nature
17 of the park, and uh the style and intent of the new the new project meeting the Secretary of
18 Interior design guidelines.

13 Srinivas Rao: Thank you, Commissioner Sales. Uh, Commissioner Delgado, you had your hand
14 up and Commissioner Sales, would you, if you're done, would you lower your hand, please?

15 Julianna Delgado: Um, I just, I wanted to um uh thank Commissioner Sepulveda for bringing up
16 some of those issues about pedestrianism and, uh, you know, and uh walking more. The the
17 intent of the law also is to SB 75 is to um help lower carbon emissions, so that kind of helps all
18 of us, it says the the global warming's act that preceded it, um i-it implements it. But in terms of
19 pedestrianism, you know, we have other documents in Pasadena, the the SCEA doesn't have to
20 be the the end all be all to everything that we're doing in Pasadena, we have a pedestrian plan,
21 we have a bike master plan, all of those things still apply whether this project goes forward or
22 not. So I just wanted to mention that. Um. And in terms of what Commissioner Sales raised
23 about the adequacy, I don't think you could do a more adequate um analysis in terms of historic
24 preservation of of this of the of the site and the and the buildings on them. Um. And and they're
25 all cor-corroborated by Teresa Grimes who I re-respect thoroughly um and her opinion. So, um
26 you know, it's, we tend to, you know, are they talking about the view out of the building or the
27 view at looking at the building? And where are you looking at the building, and they look, and
28 now they analyze it, it's so many different vantage points. I think the staff report was right on
when saying the front door is along Green Street and along Raymond, and these are really the
back, this is the back of the house we're talking about. That's why there's a parking lot there.
Right? Um, so, yes, that's why there's a parking lot and there was a swimming pool that got
filled in. And this was built at a time before Central Park, and Central Park became the open
space, it was the city's first public parking was Barney Williams homestead when, you know,
who owned Williams Hall. Um. And, you know, there is a lot of space there. If you look at the,
you know, the rest of of old Pasadena, um areas that have access to open space, there's a lot,

1 because you have Central Park. Um. So that's all I'm gonna say about it. But I still um I still
2 somehow, uh I'm thinking, I don't know where down the line uh we want to take into
3 consideration Pasadena heritage's comments about raised park, you know, raised crosswalks,
4 and maybe not having on street parking at Dayton or whatever. Um But that's for DOT to
5 determine.

6 Srinivas Rao: OK. Commissioner Delgado, thank you. If you could lower your hand, uh,
7 Commissioner Chiao, you had something to say.

8 Philip Chiao: Yes. Uh, I want to come back to Commissioner Delgado's uh original comment
9 regarding the building context versus the setting in this uh environmental review and uh let
10 difference uh is uh is clear but at the same time, I think there is a little bit of a gray area that is of
11 course some uh digging. And uh what do we consider as uh historical resource. Uh, here we
12 have two buildings, which are definitely historical resource, we have the entire city block that is
13 been declared a historical district. So that entire area, including this proposed building is part of
14 this destination. And so when we talk about historical resource and the cultural resource, we can
15 refer not only to the history of the building, uh, but also to some of the uh of the background in
16 terms of how the building come about, but definitely our original intent to build three buildings
17 around the three sides of the city block and uh three buildings continuous forming a U
18 configuration, with the courtyard as the focal point or the heart, or the garden of this complex.
19 So that is part of the historical resource and the cultural resource of this site. So uh, for, I mean,
20 all agreements with all analysis done, I think that conclusion can be interpreted a little bit
21 differently. So I think we can argue that the beauty should be connected to in fact, from a U
22 configuration. Why wouldn't the U addition, the U construction not be connected with the
23 original? That's my question. That would give you a U configuration and that would complete
24 the space that is the heart of the garden of the complex. So now we have a L configuration with
25 a building at the corner. That's totally different from the original master plan. Totally different
26 from the original intent. I don't understand if there's any continuity from the original master plan
27 or the original design. So that's the question. Now, I think we can also argue from our city's
28 design, uh, planning standards, this is a street wall we are constructing. So you have a street wall
concept, you'll have six story building of an original building, uh original uh hotel green, nine
year construction, this new building six story in height, so why would we have a one story
building in between? What happened to our street wall concept? I am really question, you know,
if, if we, if the building why couldn't be [INAUDIBLE] can be constructed? Why couldn't we
take some units from the back of the building and put them in this gap and thereby reduce the
width of the building facing, facing the park side? So this is a question a-actually raised during
the last preliminary design stage. And I think it's worth raising again, because this is a
fundamental question, goes back to the setting the context and the histor-historical and the
cultural resource we're dealing with.

Srinivas Rao: Thank you, Commissioner Chiao. Um.

1 Kevin Johnson: I-I could provide some response -

2 Srinivas Rao: Yes, please.

3 Kevin Johnson: So there is a property line in between this uh project site and um those other
4 buildings that are not on the the project site. So I I don't think the commission can ask the
5 applicant to build, uh even though they do adja-, uh only adjacent site to build additional units
6 there. In addition, the the one story building is uh also historic and contributing to old Pasadena,
7 um, so there would be potential issues there. But in either case, you know, the the issue with the
8 um environmental review under CEQA for cultural resources to determine whether the project
9 constitutes a substantial adverse change to a historical resource, which means the demolition
10 destruction or alteration of our historic resource such that as significance would be materially uh
11 materially impaired, uh meaning it would no longer qualify for historical designation. And so
12 the reports um that have been conducted for this project determine that that would not be the
13 case and would not be materially impaired under CEQA.

14 Srinivas Rao: Thank you, Kevin. Um, I-I-I think, e, you know, enough, enough uh has been said
15 about, uh about this um project. Um, I think my my own, you know, inclination is I-I agree with
16 uh Commissioner Delgado, um everything that she said. Um. And plus, it's, it's, it's a reality of
17 cities that, you know, uh cities change, and we are trying to bring transit, density, housing, all of
18 these things are um agents of change. And then we have historic resources. So ma-, some of, at
19 least some of the concerns are really what this design um commission is about. Um, so in terms
20 of the viability or or the, the SCEA itself, you know, I think, um, you know, I completely
21 support the the staff's recommendations. Um. The concerns are valid. Uh, those, those will be,
22 that's what we are here for to to um listen to those comments and address them during, through
23 our process. So um with that, if if somebody wants to make a motion, uh please feel free to do
24 so. Yes, Commissioner Delgado.

25 Julianna Delgado: Um, I'll move to um approve staff's recommendation to the city council. So I
26 think that's all that we need to do, right?

27 Srinivas Rao: Yes. Is there a second? Yes. Commissioner Lipira, thank you. And are there any
28 uh additions to or amendments to what the staff has recommended?

29 Timothy Sales: I just want to clarify something. Uh, so I looked at the resolution. So the city
30 councilors are only adopting a resolution related to the environmental documentation. So I think
31 all the issues that we've been discussing are things that are going to come back through with
32 regard to conditions of approval and things that are more than approved, I just wanted to cl-
33 clarify that because very often, they go hand in hand. So in this case, I think there's an
34 opportunity to revisit that and make sure we get the project that we know we deserve.

35 Srinivas Rao: OK. Commissioner Carpenter, you had something to say?

1 Robert Carpenter: No.

2 Srinivas Rao: No. OK. You turned on your camera, I thought - Thank you,. Um uh, Kevin, so I,
3 I, um, if that is so we, can we have a roll call please?

4 Kevin Johnson: Uh, we have a, I don't, oh yeah, we do have a second, sorry.
5 [INAUDIBLE] second. Yes, please. Go ahead.

6 Planning Department (Left): OK, Commissioner Toro.

7 Jose Noel Toro: Yes.

8 Planning Department (Left): Commissioner Sales.

9 Timothy Sales: Yes.

10 Planning Department (Left): Commissioner Lipira.

11 Stephen Lipira: Yes.

12 Planning Department (Left): Commissioner Hawthorne.

13 Christopher Hawthorne: Yes.

14 Planning Department (Left): Commissioner Delgado.

15 Julianna Delgado: Yes.

16 Planning Department (Left): Commissioner Chiao.

17 Philip Chiao: Yes.

18 Planning Department (Left): Commissioner Carpenter.

19 Robert Carpenter: Yes.

20 Planning Department (Left): Commissioner Sepulveda.

21 Yolanda Sepulveda: No.

22 Planning Department (Left): No. And Chair Rao.

23 Srinivas Rao: Yes.

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1 Planning Department (Left): OK. Motion passes.

2 Srinivas Rao: Thank you very much. And thanks uh for the entire team here to answer our
3 questions. Um. Can we take a five minute break, please?

4 Kevin Johnson: Sure, thank you.

5 Srinivas Rao: Be back in 6:25.

6 Jose Noel Toro: Sure. I will recuse myself for the next presentation.
7

8 Srinivas Rao: OK.

9 Jose Noel Toro: And I will step away from the meeting.

10 Srinivas Rao: Thank you. OK. Thanks Commissioner Toro.

11 Julianna Delgado: Take a break. [INAUDIBLE].
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I, (Amanda Eastwood), attest that the foregoing proceedings provided to me via MP3 file were transcribed by me to the best of my ability.

I further attest that I am not a relative or employee to any attorney

or

party nor financially interested in this action.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Amanda Eastwood

(Amanda Eastwood)

Date: (03/31/2022)